1765/OA

BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.

OST-95-206-19

U.S.-TORONTO SERVICE PROCEEDING	:	Docket 50168

REBUTTAL EXHIBITS OF NORTHWEST AIRLINES, INC.

Communications with respect to this document should be sent to:

Richard B. Hirst
Senior Vice President
Corporate Affairs
NORTHWEST AIRLINES, INC.
5101 Northwest Drive
St. Paul, MN 55111

Megan Rae Poldy
Associate General Counsel
NORTHWEST AIRLINES, INC.
901 15th Street, N.W.
Suite 310
Washington, D.C. 20005
(202) 842-3193

Elliott M. Seiden
Vice President, Law and
Government Affairs
David G. Mishkin
Vice President, International
and Regulatory Affairs
NORTHWEST AIRLINES, INC.
901 15th Street, N.W.
Suite 310
Washington, D.C. 20005

April 4, 1995

Note: See letter of correction attached

BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION

U.S. - TORONTO SERVICE PROCEEDING

Docket 50168

Rebuttal Exhibits of

NORTHWEST AIRLINES

NORTHWEST AIRLINES

U.S. - TORONTO SERVICE PROCEEDING
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NORTHWEST AIRLINES

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REBUTTAL NARRATIVE

INTRODUCTION

Under the new U.S.-Canada bilateral agreement, two U.S. carriers are to be selected to operate Year One limited entry Toronto service.[1] Five U.S. carriers have filed applications to provide new Toronto services through five gateways. Proposal summaries are shown in Exhibit NW-R1.

Three applicants propose service to cities in the Eastern United States. **Each of theses cities already receive nonstop service to/from Toronto**.

Continental proposes to operate, in conjunction with its code share partner and partial owner, Air Canada, two frequencies in the Toronto-Newark market. These would be in addition to:

- the 14 daily New York/Newark nonstops offered by Air Canada; and
- the seven daily New York/Newark nonstops offered by American.

USAir would offer two nonstops in the Pittsburgh-Toronto market in addition to the four nonstops currently operated by Delta.

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[1] Pending the outcome of this certificate proceeding, the Department granted exemptions to USAir and Delta to implement their proposals so as to insure that the recently negotiated U.S.-Canada rights would be implemented immediately.

Delta proposes service to Atlanta, a market that lacked nonstop service prior to the recent U.S.-Canada bilateral agreement. However, Air Canada has announced the start of thrice daily Atlanta-Toronto nonstops under the new bilateral, filling that market gap.

Only two carriers propose service to the Western half of the United States -- the area of the country that is today significantly underserved to/from Toronto.[2]

Northwest proposes to connect Toronto to its Minneapolis/St. Paul hub with two daily nonstop roundtrips and, through that hub, to provide:

- one-stop, single plane service to Boise, Idaho and Salt Lake City, Utah (NW-100, NW-102); and
- nonstop-to-nonstop connecting service to 53 Toronto-U.S. markets that together generate 87% of all Toronto-48 state traffic in markets presently without nonstop service (NW-103, NW-203, NW-301).

TWA proposes service to its St. Louis hub and, beyond St. Louis, to points on its more limited system.

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2 As noted below, all three applicants for Eastern gateways pretend to offer service to points West of the Mississippi. The services they "propose" result by accident from the scheduling of their hubs and, because of the circuity involved compared to other existing and proposed gateways, offer no meaningful public benefits.

If Benefit to the Traveling Public is the Criterion, Service to the Western United States Must Be the Department's Priority.

Prior to the conclusion of the recent U.S.-Canada bilateral agreement, the Eastern half of the United States was **relatively** well served to/from Toronto through eleven gateway cities.

As a result of changes implemented subsequent to the bilateral agreement, three additional cities in the Eastern U.S. soon will be receiving nonstop Toronto service: Atlanta, Milwaukee and Washington, DC. Indeed, two of these, Atlanta and Washington (DCA) may receive service from two carriers, one U.S., one Canadian. The result is a severely unbalanced route map, as shown in Figure 1, below, with virtually all U.S.-Toronto service forced over gateways in the Eastern third of the United States.

EXISTING TORONTO GATEWAYS BLANKET THE EAST
WHILE LEAVING MOST OF THE WEST WITHOUT SERVICE

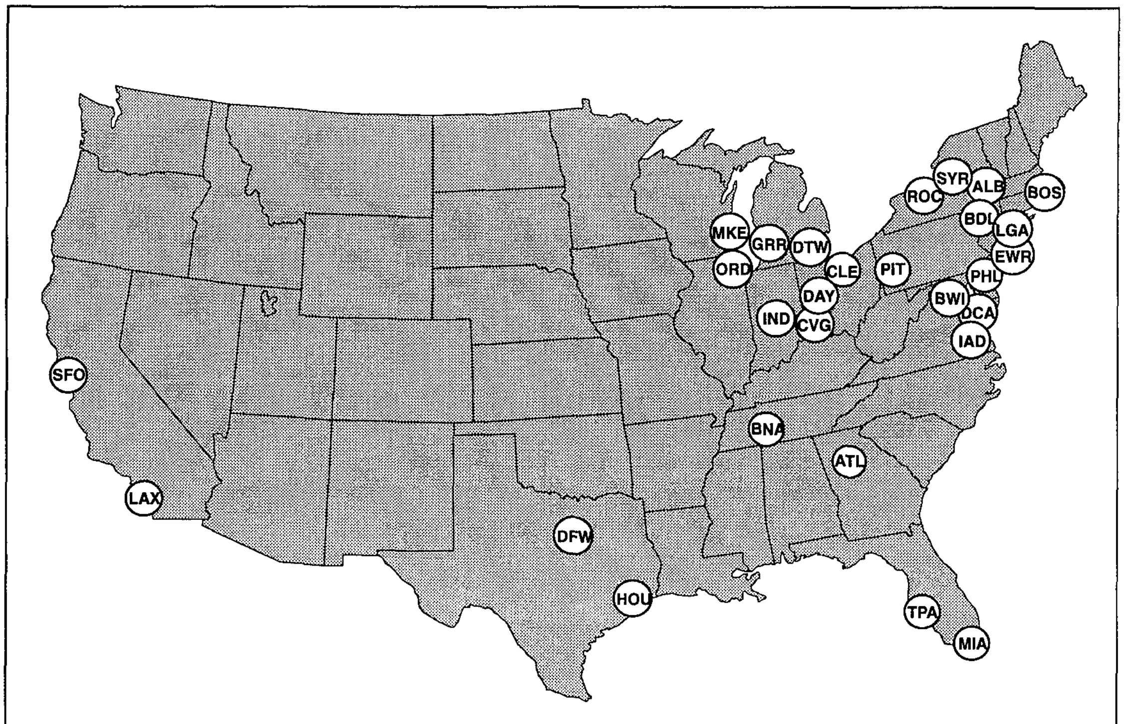

Figure 1. U.S.-Toronto Gateways, Summer 1995. Source: Exhibit NW-R2.

In contrast to the relative sufficiency of Toronto service to/from the East, passengers seeking Toronto service to/from the Western half of the United States have historically had very little direct air service. So far, at least, the recent bilateral agreement has done nothing to improve the situation. Indeed, this summer, 93%, or all but ten, of the 147 daily nonstop Toronto-48 state flights will be operated to/from points in the Eastern one-third of the United States (NW-R3).

The Department can now begin to correct the situation if it makes its **first priority the opening up of the Western half of the country to more direct air service to/from Toronto.**

At present Toronto-West passengers are required to rely on circuitous routings, backhauls from the West Coast (both Los Angeles and San Francisco are served nonstop), and/or on a few relatively non circuitous but highly congested Eastern gateways.[3]

Although there are four Toronto gateways West of the Mississippi, each is so poorly positioned geographically as to be largely ineffective for most of the region. Two, San Francisco and Los Angeles, are beyond the service area and, therefore, require substantial backhauls for any passengers using them as a gateway to other parts of the West. The other two, Dallas/Fort Worth and Houston, are so far to the South as to provide only highly circuitous access to all but a small portion of the Western half of the U.S. (NW-607). As a

[3] Primarily Chicago O'Hare. Some traffic also moves over Northwest's Detroit gateway, but, as shown below, the low circuity catchment area served by Detroit is essentially congruent with the Chicago service area. In addition, Northwest's Detroit service is already as extensive as is practical. (NW-R-9)

result, slot controlled and congested Chicago O'Hare is the principal gateway for Toronto to the entire Western half of the United States.

Given that today the majority of Toronto traffic to points West of the Mississippi must move over circuitous routings, it should not be surprising that the historic traffic levels have been suppressed. The extent of the underdevelopment of Toronto traffic in the U.S. West is reflected in comparative traffic and population data which suggest that there are nearly one million "missing" Toronto-U.S. West passengers. See Figure 2, below.

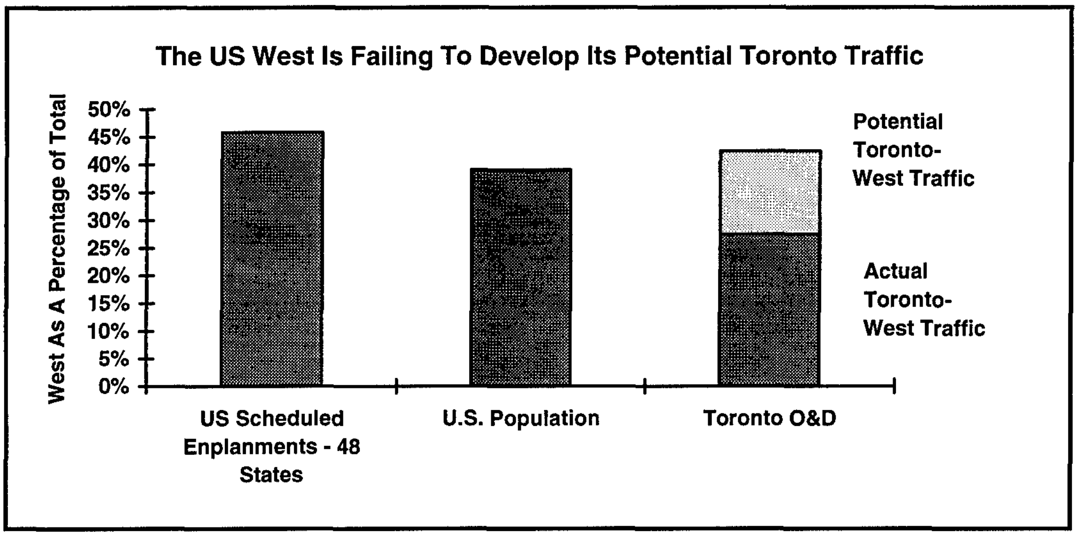

Figure 2. Relative Underdevelopment of Toronto-U.S. West Traffic. Source: Exhibit NW-R-4.

Thus, while the states west of the Mississippi contain 37% of the 48-state population and enplane 45% of all 48-state airline passengers, they generate only 27% of the 48-state-Toronto traffic, a shortfall of one million annual passengers. Clearly, the Toronto-U.S. West markets are underdeveloped (NW-R4).

Accordingly, we urge the Department to maximize the public benefits achievable given the limited number of Toronto route awards now available by insuring that

the selected gateways be ones that provide broad geographic coverage of non-circuitous services and routings to the Western two thirds of the United States.

As discussed below, no gateway matches Minneapolis/St. Paul for bringing the benefits of non circuitous and low circuity routings to the most underserved areas of the West. And no service proposal matches Northwest's for exploiting the opportunities presented by the limited Toronto entry afforded the U.S. in the first year of the new regime.

Finally, a word of caution about circuitous routings. Since every applicant proposes to connect Toronto with one or more of its domestic hubs, and since each of these hubs serves many spokes, each applicant will of necessity provide on line nonstop-to-nonstop connections to dozens of destinations, typically including all of Toronto's largest markets. Therefore in fashioning an intelligent service pattern that enhances market structure, it is important to look beyond a mere count of the number of cities to be served and to focus as well on the usefulness of the service to be provided.

For example, Delta has forecast traffic between Toronto and Salt Lake City with service via Atlanta, a 2,330 mile trip to cover a 1,660 mile distance (circuity of 40%); Continental plans to carry Toronto-El Paso traffic over Newark, an excursion adding nearly 600 miles to the journey (circuity of 35%); and USAir proposes Toronto-Minneapolis/St. Paul service via Pittsburgh, a 271 mile backhaul (circuity of 40%).

These are not very useful services and the Department should ignore their alleged public benefits and those of other services that involve backhauls or other highly circuitous routings.[4] We suggest that circuity of up to 2%, as compared to nonstop Great Circle mileages, be considered as "non circuitous" and that circuity of up to 5% be considered "low circuity". Exhibit NW-R-5 sets out Toronto's top fifteen West-of-the-Mississippi markets presently without nonstop service (for convenience, hereafter referred to as Toronto's "top fifteen"), showing the circuity of Toronto service via each gateway proposed in this proceeding and indicates the applicability of these criteria.

GEOGRAPHY DICTATES THAT NORTHWEST'S MINNEAPOLIS/ST. PAUL SERVICE PROPOSAL BE SELECTED AS THE PRIME GATEWAY TO THE UNDERSERVED WEST-OF-THE-MISSISSIPPI UNITED STATES.

Fully 22% of the U.S. population can be served over Minneapolis/St. Paul with no more than 5% circuity; most of that **without any circuity** (NW-605 & NW-609).

This service area includes 10 of the top 15 Western cities that presently lack nonstop service to/from Toronto. Indeed, the Minneapolis/St. Paul gateway will provide non circuitous routings to 20 of Toronto's top Western-state traffic producers. In total, Toronto-Western states traffic in all markets with no more than 5% circuity when served over Northwest's Minneapolis/St. Paul hub represented 750,000 passengers in 1993 (NW-608).

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4 Except for the close-in service area, or penumbra, surrounding each hub and points where somewhat circuitous service will be the best available.

Northwest's Minneapolis/St. Paul gateway will provide Toronto with low circuity service to most of the U.S. West of the Mississippi

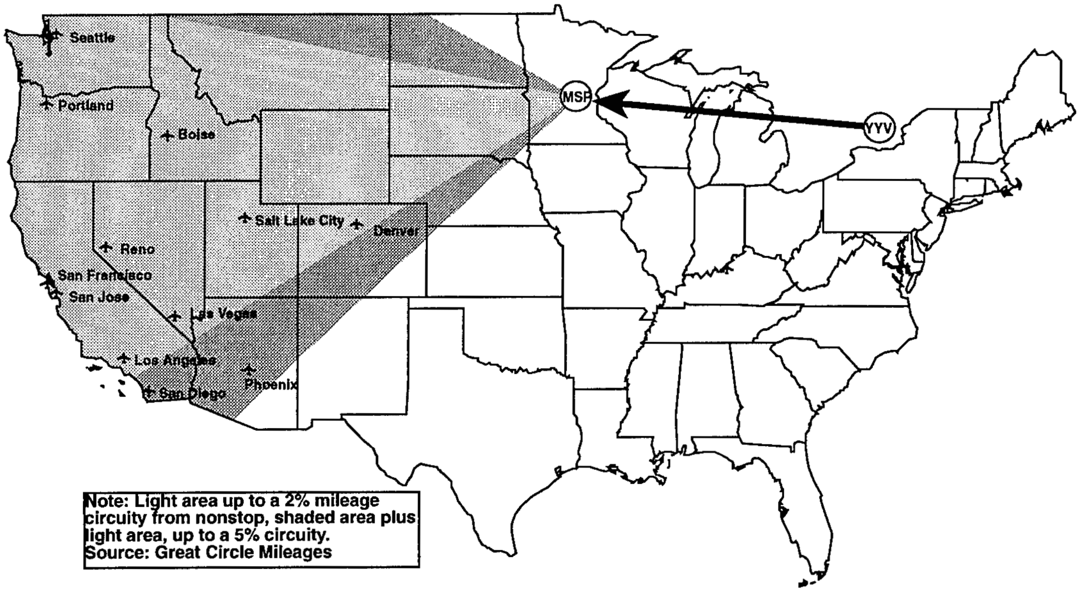


Figure 3. Low Circuity Toronto Service Over Northwest's Minneapolis/St. Paul Hub.

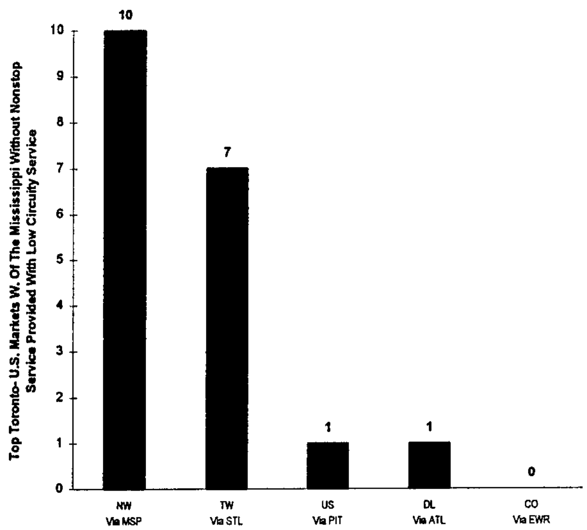
As illustrated in the charts in Figure 4, on the following page, **Northwest will convenience --**

- **more of Toronto's top fifteen Western states markets (Exhibit NW-R-5);**
- **more U.S.-West cities that exchange traffic with Toronto (Exhibit NW-R-6);**
- **more of Toronto's total U.S. West traffic (Exhibit NW-R-6); and**
- **more of the U.S. population West of the Mississippi (Exhibit NW-R-7)**

than any other carrier/gateway proposal.

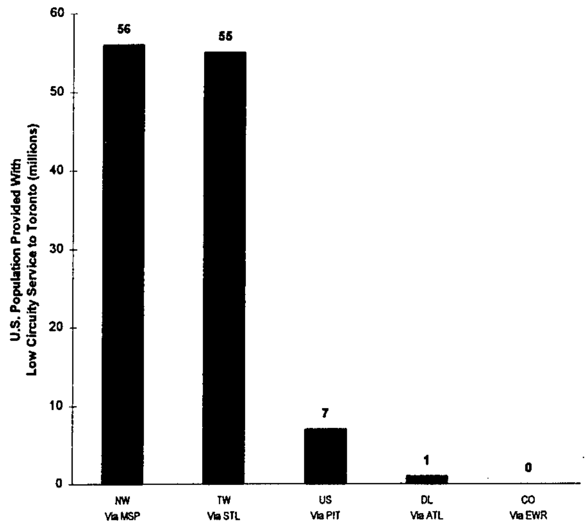
Figure 4

Northwest's Minneapolis/St. Paul Service Area Includes More Top Markets West Of The Mississippi Than Any Other Carrier
(Rebuttal to Carriers' Toronto Service Proposals)



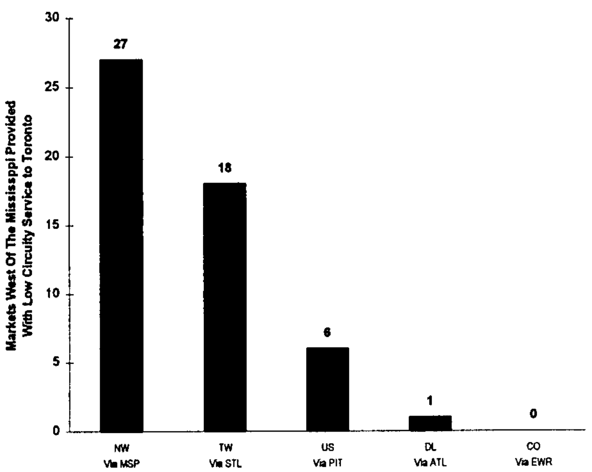
Source: NW-R-5

Northwest's Minneapolis/St. Paul Service Area Includes More People West of The Mississippi Than Any Other Carrier
(Rebuttal to Carriers' Toronto Service Proposals)



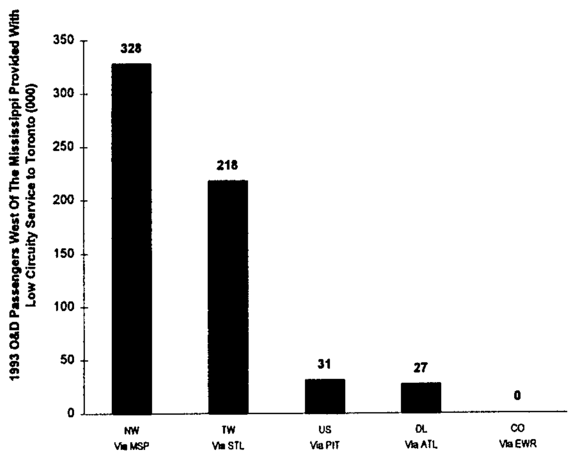
Source: NW-R-7

Northwest Will Serve More Points West Of The Mississippi Than Any Other Carrier
(Rebuttal to Carriers' Toronto Service Proposal)



Source: NW-R-6

Northwest's Minneapolis/St. Paul Service Will Convenience More Passengers West Of The Mississippi Than Any Other Carrier
(Rebuttal to Carriers'Toronto Service Proposals)



Source: NW-R-6

While Chicago, by default, has served as one of Toronto's primary gateways to the Western United States, Minneapolis/St. Paul provides the most direct access to the more Northerly points in the West. Indeed 58% of the Western states markets that would be served by Northwest have no published nonstop-to-nonstop connections by either American or United over Chicago (NW-R-8).

Similarly, Northwest's Detroit hub is focused on different markets than its hub at Minneapolis/St. Paul. Indeed, for cities West of the Mississippi, the Toronto-Detroit low circuity catchment area is substantially similar to Chicago's, while Minneapolis/St. Paul will provide service in many different markets. This is illustrated by the fact that 51 of Northwest's 60 largest Toronto-Minneapolis/St. Paul-beyond markets do not have published roundtrip schedules via Detroit (NW-R-8). In addition, Northwest's Detroit Toronto service is at maximum capacity. Toronto-Minneapolis service is needed to accommodate passenger traffic to the west. (NW-R-9)

For those central and southwestern cities that may be conveniently served from either Chicago or Minneapolis/St. Paul, Northwest's service will introduce significant new inter-gateway competition and give passengers more service options (NW-119). The introduction of inter-gateway competition between American and United at Chicago and Northwest at Minneapolis/St. Paul will undoubtedly stimulate new traffic between Toronto, on the one hand, and the entire behind-gateway networks of the two O'Hare carriers.[5]

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[5] And Chicago is both slot controlled and congested, inhibiting further the incentive of carriers to develop Toronto-U.S. traffic flows when existing services compete for scarce slots and facilities.

TWA'S PROPOSAL -- THE ONLY OTHER PROPOSAL FOR SERVICE TO THE WEST -- IS INFERIOR TO NORTHWEST'S MINNEAPOLIS/ST. PAUL PROPOSAL IN BENEFITS TO POPULATION, POINTS NOW WITHOUT NONSTOP SERVICE AND TRAFFIC.

Like Northwest, TWA proposes a western gateway, St. Louis, through which to provide service to the U.S. West of the Mississippi. For a variety of reasons, Minneapolis/St. Paul is a superior choice for a new Western gateway if only one such gateway is to be chosen.

First, and contrary to TWA's claims, Minneapolis/St. Paul is a substantially larger local Toronto market than St. Louis. It has a larger metropolitan area population and -- based on actual 1993 O&D data -- almost twice the local Toronto traffic.(NW-R-10) Indeed, Minneapolis/St. Paul-Toronto O&D traffic is greater than that of any other city west of the Mississippi not now receiving nonstop service. St. Louis ranks a weak eighth on this measurement.

TWA's claim of a greater O&D market for St. Louis is based not on facts but on forecasts. And very dubious forecasts at that. When apples-to-apples comparisons are made, Minneapolis/St. Paul emerges clearly as the larger Toronto market (NW-R-11). For example, if one were to use TWA's aggressive forecasting methods to estimate the O&D markets for both St. Louis and Minneapolis/St. Paul, the latter is almost 80% larger. Conversely, Northwest's more conservative methodology shows Minneapolis/St. Paul to be a 52% larger local market. TWA's claim that St. Louis is the larger market can be supported only by using aggressive methodologies to forecast St. Louis and conservative methodologies to forecast Minneapolis/St. Paul. Such comparisons are meaningless, if not misleading.[6]

Second, Minneapolis/St. Paul is a superior connecting point for more of the western United States than is St. Louis. St. Louis' natural catchment area is essentially limited to the Southwest, a region that already has three internal gateways (Dallas/Ft. Worth, Houston, and Los Angeles) and that can also be served with low circuity through Chicago and Detroit and, in the case of Texas, through Cincinnati and Cleveland as well. St. Louis brings nothing new to the table in terms of connecting service, and (again) its local O&D market is very small. (NW-R-13)

TWA's low-circuity service area is entirely within the larger low-circuity service area of Chicago, the hub city of two carriers -- American and United -- that already serve Toronto and that have far larger western-state networks than TWA. In addition, Midwest Express has now been authorized to inaugurate Toronto service through its Milwaukee hub and will provide on-line services to two key cities in TWA's St. Louis service area -- Dallas/Ft. Worth and St. Louis itself -- and has the potential to provide additional low circuity connections to Toronto that would totally overlap TWA's. Finally, and unlike Minneapolis/St. Paul, much of TWA's catchment area also overlaps Northwest's existing services from Detroit.

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6 Another defect in TWA's forecasts -- and hence its claims of substantial service benefits -- is its unrealistic prediction that its two St. Louis-Toronto daily flights can capture a 75% share of that market. By comparison, Northwest has more reasonably forecast that its startup service will capture 30% of the Minneapolis/St. Paul-Toronto market. See NW-R-12.

As a result, TWA will provide service to only six of the top 15 Western states markets without nonstop Toronto service. Northwest will serve ten. More important, those ten Northwest markets include nearly 300,000 O&D passengers, 173% as much traffic as TWA's six markets.

NONE OF THE PROPOSALS FOR SERVICE TO THE EAST MATCHES NORTHWEST'S MINNEAPOLIS/ST. PAUL PROPOSAL IN BENEFITS TO POPULATION, POINTS NOW WITHOUT NONSTOP SERVICE OR TRAFFIC.

USAIR.

While the Department's decision to award USAir Pittsburgh authority by exemption might have made sense in the context of the Department's conclusion that the overriding public interest criterion was speed of implementation, in the broader context of the award of permanent authority, where only two new awards are possible, it would be contrary to the public interest to double track the Pittsburgh-Toronto market while leaving unserved larger local markets and cities offering better connecting opportunities.

First, the Pittsburgh O&D market is relatively small; too small to justify the award of first nonstop service in a limited entry situation where the Department must choose among a number of worthy candidate markets for the award of only two authorities (NW-R-14). Even if Pittsburgh were without nonstop service to Toronto, it would not qualify for the award of service in this proceeding based on a local O&D market significantly smaller than such unserved cities as Minneapolis/St. Paul.[7]

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[7] Since Pittsburgh has long enjoyed nonstop service to/from Toronto, its historic O&D has been stimulated relative to the understated potential reflected in the unstimulated historic O&D figures for unserved cities.

Second, Pittsburgh already has nonstop service to/from Toronto as a result of Delta's authority arising under the previous bilateral. Delta currently provides four nonstop flights between the two cities. (NW-R-15)

Third, the beyond market services to be offered by USAir are of little public benefit. This is so for a number of reasons.

- USAir already has seven Toronto gateways all located relatively near Pittsburgh in the U.S. Northeast. Thus essentially all of the markets beyond Pittsburgh that it would serve are markets that it can already serve with relatively non circuitous -- and often less circuitous -- service over one or more of the other gateways. Indeed, 85% of the beyond markets that USAir proposes to serve beyond Pittsburgh already receive USAir service to Toronto. (NW-R-16)

- All but two of the USAir on line markets that would receive new USAir service beyond Pittsburgh are very small markets that account collectively for only 0.6% of the O&D traffic in USAir's Toronto-Pittsburgh on-line markets.[8] (NW-R-17)

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[8] The only other markets that would receive "new" USAir service are Pittsburgh itself, which already receives four daily nonstop roundtrips from Delta, and Minneapolis/St. Paul, which, we agree, needs Toronto service but which would receive nonstop service under Northwest's proposal, far superior to the connecting service to be offered by USAir.

- The vast majority of the markets that USAir would serve, including 98% of the O&D traffic, already have nonstop service or equal or better service by another carrier over another gateway. (NW-R-18)

- Only one of USAir's beyond markets that would receive non circuitous or low circuity service are in the region that is today without adequate service to/from Toronto, namely the area West of the Mississippi. In contrast, Northwest will serve ten of the fifteen largest West of the Mississippi markets now without nonstop Toronto service. (NW-R-5)

- **USAir will provide service in Western states markets that generate a total of less than 57,000 O&D passengers; Northwest's markets include more than 700,000 passengers**. (NW-R-5)

CONTINENTAL.

Continental proposes service to the New York metropolitan area with two daily roundtrips to Newark. New York is already served on a nonstop basis by one U.S. carrier and one Canadian carrier through two airports, LaGuardia and Newark. Collectively, they provide 21 daily Toronto nonstop roundtrips. Continental's proposal, therefore, would simply multi-track existing services. (NW-R-19)

Moreover, Continental would provide no low-circuity service to any Western city and would offer no low-circuity nonstop-to-nonstop connection to any city anywhere that does not already receive such service over another gateway in the East. Given the limitation of two new carrier/gateway proposals, it would be wasteful of the U.S.'s restricted new entry opportunities to designate a carrier to provide service in a market, however large, that is already served by two carriers both of which can, under the bilateral, increase frequency without limit to meet expanding market demand.

The true significance of Continental's proposal -- for Continental and its code share partner/owner, Air Canada -- is that it would enable Continental to put the CO code on all of Air Canada's Toronto-New York flights. While this is undoubtedly of great benefit to Air Canada and Continental, the benefits to the traveling public pale in comparison to those offered by the introduction of nonstop service to cities now unserved and connecting services over gateways and to regions now lacking low circuity service to/from Toronto.

SELECTION OF EITHER USAIR OR DELTA WILL RESULT IN A FURTHER CONCENTRATION OF U.S.-TORONTO SERVICE IN THE HANDS OF THREE DOMINANT CARRIERS. SELECTION OF BOTH WILL FURTHER EXACERBATE THAT CONCENTRATION.

Prior to the renegotiation of the U.S.-Canada bilateral, U.S.-Toronto service was concentrated in the hands of three dominant U.S. carriers: Delta, USAir and American. With the award of exemption authority to both Delta and USAir, that already high level of concentration has been increased. This summer, if the Department authorizies the inauguration of Toronto-Washington service by USAir, the three carriers will be offering 49,000 weekly seats, or 78% of total U.S. carrier Toronto service (NW-R-20). If the Department certificates either Delta or USAir, or both, it will be forgoing the opportunity offered by the new bilateral to open these highly concentrated markets to the benefits of competition. Given that both USAir and Delta will be offering service in markets already receiving nonstop service from other carriers and in the part of the country that is already comparatively well served, awards to either or both can only be viewed as a step backwards in the Department's efforts to promote the public interest by encouraging competition.

COMPARISON OF TORONTO SERVICE PROPOSALS, TRAFFIC FORECASTS AND FINANCIAL FORECASTS

Applicant:	NORTHWEST	DELTA	CONTINENTAL
Gateway:	MINNEAPOLIS / ST. PAUL	ATLANTA	NEWARK

Service Proposals

	NORTHWEST	DELTA	CONTINENTAL
Aircraft Type	DC-9-30	B-757	B-737-300
Seats	100	180	128
Non-stop Miles	681	739	349
Departures Performed	1,450	1,432	1,438
Completion Factor	99.0%	98%	98.5%

Traffic Forecasts

	NORTHWEST		DELTA		CONTINENTAL	
Local Market	17,587	16.6%	79,453	43.4%	59,964	47.6%
Beyond - U.S. Markets	84,294	79.6%	99,636	54.5%	51,724	41.0%
Beyond - Foreign Markets	0	0.0%	3,790	2.1%	8,760	7.0%
Other	4,075	3.8%	0	0.0%	5,584	4.4%
Total On Board Passengers	105,956	100.0%	182,879	100.0%	126,032	100.0%
Departing Seats	145,000		257,760		184,064	
Load Factor	73.1%		70.9%		68.5%	

Financial Data ($ 000)	On-Segment	Beyond	Total	On-Segment	Beyond	Total	On-Segment	Beyond	Total
Passenger Revenues	$11,028	$10,842	$21,870			$35,648			$13,528
Other Revenues	657	666	1,323			1,540			522
Total Revenues	11,685	11,508	23,193			37,188			14,050
Operating Expenses Other	9,973	2,985	13,107			20,848			11,863
Operating P&L	1,712	8,523	10,086	N.A.	N.A.	16,339	N.A.	N.A.	2,187
Operating Margin	14.7%	74.1%	43.5%	N.A.	N.A.	43.9%	N.A.	N.A.	15.6%

DATA BEFORE SELF DIVERSION

	NORTHWEST	DELTA	CONTINENTAL
Source Exhibits	NW-301, 305, 401, 402	DL-301, 402, 410	CO-301, 401
Footnotes		Profitability of on-segment and beyond not specified in exhibits.	Profitability of on-segment and beyond not specified in exhibits. Operating Profit Lower than indicated in Continental's exhibit as Beyond Traffic Variable Expenses & Start-up Costs included above in Operating Expenses for consistency.

COMPARISON OF TORONTO SERVICE PROPOSALS, TRAFFIC FORECASTS AND FINANCIAL FORECASTS

Applicant: Gateway:	TWA ST. LOUIS		USAIR PITTSBURGH	
Service Proposals				
Aircraft Type	MD-80		B-757 / DC-9 / B-737	
Seats	132		182 / 103 / 108	
Non-stop Miles	654		222	
Departures Performed	1,460		1,435	
Completion Factor	100%		98%	
Traffic Forecasts				
Local Market	46,230	44.0%	15,559	9.8%
Beyond - U.S. Markets	54,041	51.4%	136,364	86.3%
Beyond - Foreign Markets	0	0.0%	0	0.0%
Other	4,900	4.7%	6,077	3.8%
Total On Board Passengers	105,171	100.0%	158,000	100.0%
Departing Seats	192,720		250,132	
Load Factor	54.6%		63.2%	

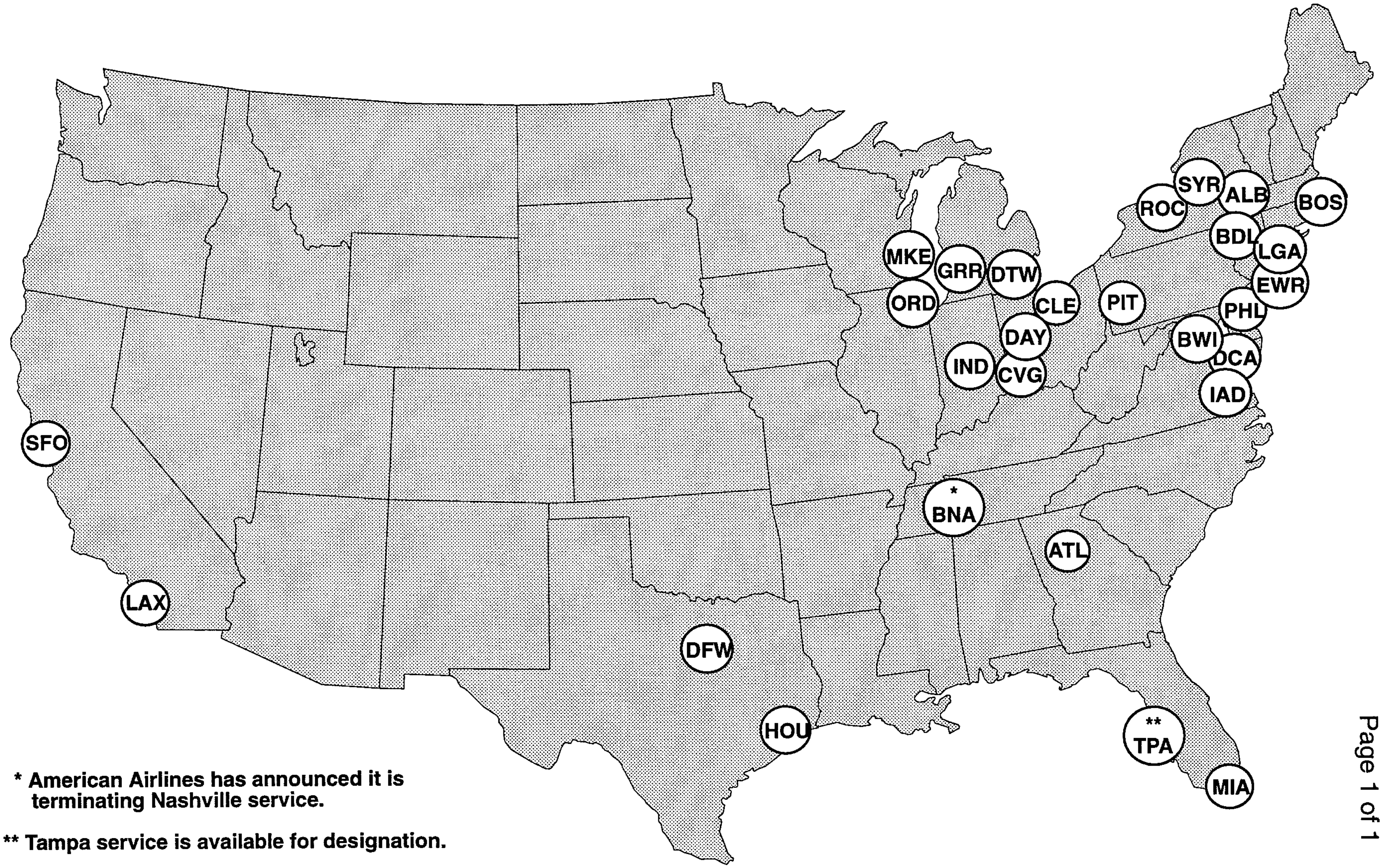
Financial Data ($ 000)	TWA On-Segment	TWA Beyond	TWA Total	USAIR On-Segment	USAIR Beyond	USAIR Total
Passenger Revenues			$19,714	$9,577	$19,738	$29,315
Other Revenues			374	955	1,969	2,924
Total Revenues			20,088	10,532	21,707	$32,239
Operating Expenses			13,474	10,017	6,330	16,348
Other						
Operating P&L	N.A.	N.A.	6,614	515	15,377	15,892
Operating Margin	N.A.	N.A.	32.9%	4.9%	70.8%	49.3%

DATA BEFORE SELF DIVERSION

	TWA	USAIR
Source Exhibits	TWA-153, 301, 401	US-301 Revisded, 401, 403
Footnotes	Profitability of on-segment and beyond not specified in exhibits.	

Docket 50168
Exhibit NW-R-2

EXISTING TORONTO GATEWAYS BLANKET THE EAST WHILE LEAVING MOST OF THE WEST WITHOUT SERVICE



* American Airlines has announced it is terminating Nashville service.

** Tampa service is available for designation.

Source: NW-R- 3

THE PERCENT OF U.S. - TORONTO NONSTOP SERVICE THROUGH GATEWAYS EAST OF THE MISSISSIPPI IS NOW 93%

(Rebuttal to Carrier Applications)

Between Toronto And:	April 1995 [1] East	West
Albany, NY	2	
Atlanta	6	
Baltimore	8	
Boston	8	
Chicago	16	
Cincinnati	9	
Cleveland	9	
Dallas/Ft. Worth		3
Dayton	2	
Detroit	5	
Hartford	5	
Houston		2
Indianapolis	1	
Los Angeles		3
Milwaukee	2	
Miami	4	
Nashville	2	
New York/Newark	23	
Philadelphia	5	
Pittsburgh	6	
Rochester, NY	2	
San Francisco		2
Syracuse	3	
Tampa	4	
Washington, DC	16	
Total	138	10

Eastern Markets	**93.2%**	
Western Markets		**6.8%**

[1] Daily nonstop flights in each direction.

Source: Official Airline Guide & Carrier Announcements

TORONTO'S U.S. MARKETS WEST OF THE MISSISSIPPI RIVER ARE SIGNIFICANTLY UNDER DEVELOPED

(Rebuttal to Carriers' Toronto Service Proposals)

Population 1/	Population as of 1/1/94	Percent of Total Market
West of the Mississippi	101,303,800	39.0%
East " "	158,270,400	61.0%
Total	259,574,200	100.0%

Enplaned Passengers 2/	1993 Enplaned Passengers	Percent of Total Market
West of the Mississippi	207,529,116	45.8%
East " "	245,856,093	54.2%
Total	453,385,209	100.0%

1993 O&D Passengers Toronto - U.S. 48 States 3/	1993 O&D Passengers	Percent of Total Market	Passengers Per Day Each Way
West of the Mississippi	1,040,760	27.4%	1,426
East " "	2,760,793	72.6%	3,782
Total	3,801,553	100.0%	5,208
Normalized 1993 O&D Passengers Toronto - U.S. 48 States 4/			
West of the Mississippi	2,032,250	42.4%	2,784
East " "	2,760,793	57.6%	3,782
Total	4,793,043	100.0%	6,566

UNDER DEVELOPMENT EQUALS 991,490 PASSENGERS

All data for U.S. 48 States

1/ Source: Sales & Marketing Management, Survey of Buying Power

2/ Source: DOT Airport Activity Statistics

3/ Source: Exhibit NW-601

4/ Assumes Toronto - U.S. Markets West of the Mississippi equal 42.4% of total Toronto - U.S. 48 States Market based on the average Population and Enplaned Passenger Shares for Western States.

NORTHWEST'S MINNEAPOLIS / ST. PAUL SERVICE AREA INCLUDES MORE TOP MARKETS WEST OF THE MISSISSIPPI THAN ANY OTHER CARRIER

(Rebuttal To Carriers' Toronto Service Proposals)

				Routing % Longer than Nonstop				
Serial	Overall Traffic Rank	Origin City	O&D Passengers 1993	Northwest via Minneapolis	Delta via Atlanta	Continental via Newark	USAir via Pittsburgh	TWA via St. Louis
Cities With Toronto Nonstop Service								
1	3	Los Angeles, CA	247,580	***1.9%***	23.4%	28.8%	8.5%	***3.4%***
2	7	San Francisco, CA	171,040	***0.5%***	27.4%	28.9%	9.6%	5.8%
3	9	Dallas / Ft. Worth, TX	102,130	27.8%	22.6%	43.4%	7.7%	***0.6%***
4	24	Houston, TX	29,070	34.0%	11.6%	36.5%	**4.8%**	**3.4%**
			549,820					
Cities Without Toronto Nonstop Service								
1	13	MINNEAPOLIS/ST.PAUL, MI	51,290	***0.0%***	141.9%	99.4%	39.8%	62.4%
2	15	PHOENIX, ARIZONA	49,030	**4.3%**	24.0%	32.2%	8.6%	**2.2%**
3	19	DENVER, COLORADO	39,820	**3.5%**	46.7%	48.0%	14.9%	8.2%
4	21	SAN DIEGO, CALIFORNIA	32,030	**2.6%**	21.9%	28.5%	8.0%	**2.6%**
5	22	LAS VEGAS, NEVADA	31,900	***2.0%***	27.9%	32.5%	9.8%	**4.3%**
6	23	SEATTLE, WASHINGTON	29,360	***1.0%***	41.7%	33.4%	13.9%	14.8%
7	25	ST. LOUIS, MISSOURI	28,520	72.4%	86.6%	86.3%	18.8%	***0.0%***
8	27	NEW ORLEANS, LOUISIAN	27,560	55.0%	**4.9%**	36.5%	**2.8%**	13.4%
9	31	KANSAS CITY, MISSOURI	19,990	28.2%	70.6%	71.8%	18.9%	6.5%
10	35	SALT LAKE CITY, UTAH	16,790	***0.8%***	40.3%	39.6%	13.4%	9.2%
11	37	SAN JOSE, CALIFORNIA	16,090	***0.6%***	27.2%	29.0%	9.6%	5.7%
12	38	SANTA ANA, CALIFORNIA	14,550	**2.1%**	23.2%	28.9%	8.4%	**3.2%**
13	39	TUCSON, ARIZONA	13,110	5.7%	21.7%	31.5%	7.9%	***1.4%***
14	40	PORTLAND, OREGON	13,060	***0.5%***	38.8%	32.7%	13.1%	12.7%
15	42	SAN ANTONIO, TX	12,650	24.8%	13.3%	34.6%	5.3%	***1.2%***
			383,100					

	Northwest via Minneapolis	Delta via Atlanta	Continental via Newark	USAir via Pittsburgh	TWA via St. Louis
CITIES WITHIN 5% CIRCUITY					
Cities With Toronto Nonstop Service	2	0	0	1	3
Cities Without Toronto Nonstop Service	10	1	0	1	7
Total	**12**	**1**	**0**	**2**	**10**
1993 O&D PASSENGERS THAT COULD BE SERVED WITHIN 5% CIRCUITY					
Cities With Toronto Nonstop Service	418,620	0	0	29,070	378,780
Cities Without Toronto Nonstop Service	293,920	27,560	0	27,560	181,790
Total	**712,540**	**27,560**	**0**	**56,630**	**560,570**
% OF TOTAL O&D FOR TOP MARKETS WEST OF THE MISSISSIPPI					
Cities With Toronto Nonstop Service	76.1%	0.0%	0.0%	5.3%	68.9%
Cities Without Toronto Nonstop Service	76.7%	7.2%	0.0%	7.2%	47.5%
Total	76.4%	3.0%	0.0%	6.1%	60.1%

$\boxed{}$ = Low Circuity Markets

Numbers in BOLD ITALICS = Markets within 2% Circuity

Numbers in BOLD = Markets within 2.1% - 5% Circuity

Source: Exhibits NW-302, 303
Great Circle Mileages

NORTHWEST'S MINNEAPOLIS / ST. PAUL SERVICE AREA WILL CONVENIENCE MORE PASSENGERS AND WILL PROVIDE MORE MARKETS WITH LOW CIRCUITY SERVICE WEST OF THE MISSISSIPPI THAN ANY OTHER CARRIER

(Rebuttal To TWA's Toronto Application)

US Cities Without Toronto Nonstop Jet Service
Ranked By 1993 O&D Passengers

US Rank	Origin Code	Origin City	Applicant: Northwest Gateway: MSP	TWA STL	USAir PIT	Delta ATL	Continental EWR	CY 1993
3	MSP	MINNEAPOLIS/ST.PAUL,	51,290					51,290
4	PHX	PHOENIX, ARIZONA, USA	49,030	49,030				49,030
7	DEN	DENVER, COLORADO, USA	39,820					39,820
8	SAN	SAN DIEGO, CALIFORNIA	32,030	32,030				32,030
9	LAS	LAS VEGAS, NEVADA, US	31,900	31,900				31,900
10	SEA	SEATTLE, WASHINGTON,	29,360					29,360
11	STL	ST. LOUIS, MISSOURI,		28,520				28,520
13	MSY	NEW ORLEANS, LOUISIAN			27,560	27,560		27,560
17	MCI	KANSAS CITY, MISSOURI						19,990
21	SLC	SALT LAKE CITY, UTAH,	16,790					16,790
23	SJC	SAN JOSE, CALIFORNIA,	16,090					16,090
24	SNA	SANTA ANA, CALIFORNIA	14,550	14,550				14,550
25	TUS	TUCSON, ARIZONA, USA						13,110
26	PDX	PORTLAND, OREGON, USA	13,060					13,060
28	SAT	SAN ANTONIO, TEXAS, U		12,650				12,650
32	ONT	ONTARIO, CALIFORNIA,	9,850	9,850				9,850
33	AUS	AUSTIN, TEXAS, USA		9,410				9,410
34	ABQ	ALBUQUERQUE, NEW MEXI		9,280				9,280
37	SMF	SACRAMENTO, CALIFORNI	7,910					7,910
42	PSP	INDIO/PALM SPRINGS, C						6,810
45	OMA	OMAHA, NEBRASKA, USA						5,410
47	TUL	TULSA, OKLAHOMA, USA		5,320				5,320
48	RNO	RENO, NEVADA, USA	5,290					5,290
51	DSM	DES MOINES, IOWA, USA						4,980
53	ICT	WICHITA, KANSAS, USA		4,560				4,560
59	ELP	EL PASO, TEXAS, USA						4,200
60	CID	CEDAR RAPIDS/IOWA CIT						4,190
66	OKC	OKLAHOMA CITY, OKLAHO		3,860				3,860
67	LIT	LITTLE ROCK, ARKANSAS		3,710				3,710
68	RST	ROCHESTER, MINNESOTA,						3,710
69	COS	COLORADO SPRINGS, COL						3,670
74	GEG	SPOKANE, WASHINGTON,	3,280					3,280
75	OAK	OAKLAND, CALIF.						3,230
79	EGE	EAGLE, COLORADO, USA						2,610
80	BTR	BATON ROUGE, LOUISIAN			2,450			2,450
82	HRL	HARLINGEN, TEXAS, USA						2,310
83	LNK	LINCOLN, NEBRASKA, US						2,170
84	ASE	ASPEN, COLORADO, USA						2,150
85	CRP	CORPUS CHRISTI, TEXAS						2,110
93	BOI	BOISE, IDAHO, USA	1,890					1,890
99	FAT	FRESNO, CALIFORNIA, U						1,770
102	MFE	MISSION/MCALLEN, TEXA						1,640
114	FAR	FARGO, NORTH DAKOTA,	1,320					1,320
116	DLH	DULUTH, MINNESOTA, US						1,230
117	FSD	SIOUX FALLS, SOUTH DA	1,230					1,230
118	SGF	SPRINGFIELD, MISSOURI		1,220				1,220
122	JAC	JACKSON, WYOMING, USA						1,110
124	FYV	FAYETTEVILLE, ARKANSA		1,100				1,100
126	LBB	LUBBOCK, TEXAS, USA						1,060
127	BUR	BURBANK, CALIFORNIA,						1,000
128	SBA	SANTA BARBARA, CALIFO						990
131	EUG	EUGENE, OREGON, USA						950

NORTHWEST'S MINNEAPOLIS / ST. PAUL SERVICE AREA WILL CONVENIENCE MORE PASSENGERS AND WILL PROVIDE MORE MARKETS WITH LOW CIRCUITY SERVICE WEST OF THE MISSISSIPPI THAN ANY OTHER CARRIER

(Rebuttal To TWA's Toronto Application)

US Cities Without Toronto Nonstop Jet Service
Ranked By 1993 O&D Passengers

US	Origin		Applicant:	Northwest	TWA	USAir	Delta	Continental	
Rank	Code	Origin City	Gateway:	MSP	STL	PIT	ATL	EWR	CY 1993
132	SHV	SHREVEPORT, LOUISIANA			940				940
136	MRY	MONTEREY, CALIFORNIA,							870
142	ALO	WATERLOO, IOWA, USA							740
147	HDN	STEAMBOAT SPRINGS, CO							670
149	LFT	LAFAYETTE, LOUISIANA,				660			660
151	SUX	SIOUX CITY, IOWA, USA							630
152	TYR	TYLER, TEXAS, USA							630
153	RAP	RAPID CITY, SOUTH DAK		600					600
154	BZN	BOZEMAN, MONTANA, USA		580					580
155	MAF	MIDLAND/ODESSA, TEXAS							570
160	GFK	GRAND FORKS, NORTH DA							540
163	BIL	BILLINGS, MONTANA, US		520					520
164	DBQ	DUBUQUE, IOWA, USA							500
165	MLU	MONROE, LOUISIANA, US							490
167	GGG	LONGVIEW, TEXAS, USA							480
171	AMA	AMARILLO, TEXAS, USA							450
172	JLN	JOPLIN, MISSOURI, USA			430				430
176	BFL	BAKERSFIELD, CALIFORN							400
177	CLL	COLLEGE STATION, TEXA							400
178	FSM	FT. SMITH, ARKANSAS,							400
179	LGB	LONG BEACH, CALIFORNI							400
180	MOT	MINOT, NORTH DAKOTA,		400					400
182	BRL	BURLINGTON, IOWA, USA							390
183	PSC	PASCO, WASHINGTON, US							390
184	SPS	WICHITA FALLS, TEXAS							390
188	EKO	ELKO, NEVADA, USA							360
189	MSO	MISSOULA, MONTANA, US		360					360
190	ACT	WACO, TEXAS, USA							360
191	BPT	BEAUMONT/PORT ARTHUR,				350			350
193	BIS	BISMARCK, NORTH DAKOT		340					340
195	IDA	IDAHO FALLS, IDAHO, U							330
196	MFR	MEDFORD, OREGON, USA							330
199	LRD	LAREDO, TEXAS, USA							320
201	ESF	ALEXANDRIA, LOUISIANA				300			300
206	ABI	ABILENE, TEXAS, USA							280
208	TXK	TEXARKANA, ARKANSAS,							270
210	MTJ	MONTROSE, COLORADO, U							260
211	BJI	BEMIDJI, MINNESOTA, U							250
212	GUC	GUNNISON, COLORADO, U							250
213	CKB	CLARKSBURG, WEST VIRG							240
214	LAW	LAWTON, OKLAHOMA, USA							240
216	PKB	PARKERSBURG, WEST VIR							240
218	SUN	SUN VALLEY, IDAHO, US							230
219	LCH	LAKE CHARLES, LOUISIA				220			220
220	SBP	SAN LUIS OBISPO, CALI							220
222	FNL	FORT COLLINS/LOVELAND							200
224	FCA	KALISPELL, MONTANA, U							190
226	SPW	SPENCER, IOWA, USA							190
227	CPR	CASPER, WYOMING, USA							180
229	SMX	SANTA MARIA, CALIFORN							180
230	GJT	GRAND JUNCTION, COLOR							170
231	GTF	GREAT FALLS, MONTANA,		170					170

NORTHWEST'S MINNEAPOLIS / ST. PAUL SERVICE AREA WILL CONVENIENCE MORE PASSENGERS AND WILL PROVIDE MORE MARKETS WITH LOW CIRCUITY SERVICE WEST OF THE MISSISSIPPI THAN ANY OTHER CARRIER

(Rebuttal To TWA's Toronto Application)

US Cities Without Toronto Nonstop Jet Service
Ranked By 1993 O&D Passengers

US Rank	Origin Code	Origin City	Applicant: Gateway:	Northwest MSP	TWA STL	USAir PIT	Delta ATL	Continental EWR	CY 1993
232	MCW	MASON CITY, IOWA, USA							170
234	YUM	YUMA, ARIZONA, USA							170
244	DRO	DURANGO, COLORADO, US							130
249	BLI	BELLINGHAM, WASHINGTO							120
250	BRD	BRAINERD, MINNESOTA,							120
252	COU	COLUMBIA, MISSOURI, U			120				120
254	PUB	PUEBLO, COLORADO, USA							120
255	VIS	VISALIA, CALIFORNIA,							120
256	ILE	KILLEEN, TEXAS, USA							110
257	TVL	LAKE TAHOE, CALIFORNI							110
258	MOD	MODESTO, CALIFORNIA,							100
259	OTM	OTTUMWA, IOWA, USA							100
260	SGU	ST. GEORGE, UTAH, USA							100
262	BTM	BUTTE, MONTANA, USA							90
264	SJT	SAN ANGELO, TEXAS, US							90
265	ABR	ABERDEEN, SOUTH DAKOT		80					80
266	FMN	FARMINGTON, NEW MEXIC							80
267	GPZ	GRAND RAPIDS, MINNESO							80
270	TEX	TELLURIDE, COLORADO,							80
271	CLD	CARLSBAD, CALIFORNIA,							70
272	CIC	CHICO, CALIFORNIA, US							70
275	HLN	HELENA, MONTANA, USA							70
277	RDM	REDMOND, OREGON, USA							70
278	ATY	WATERTOWN, SOUTH DAKO		70					70
279	IYK	INYOKERN, CALIFORNIA,							60
285	ALS	ALAMOSA, COLORADO, US							50
288	FOD	FT. DODGE, IOWA, USA							50
290	OXR	OXNARD, CALIFORNIA, U							50
291	FLG	FLAGSTAFF, ARIZONA, U							40
292	GCN	GRAND CANYON, ARIZONA							40
295	PIH	POCATELLO, IDAHO, USA							40
297	PUW	PULLMAN, WASHINGTON,							40
298	RDD	REDDING, CALIFORNIA,							40
299	RKS	ROCK SPRINGS, WYOMING							40
300	FOE	TOPEKA, KANSAS, USA							40
301	TWF	TWIN FALLS, IDAHO, US							40
302	EAT	WENATCHEE, WASHINGTON							40
304	CYS	CHEYENNE, WYOMING, US							30
305	ACV	EUREKA/ARCATA, CALIFO							30
306	GCC	GILLETTE, WYOMING, US							30
308	LWS	LEWISTON, IDAHO, USA							30
309	PIR	PIERRE, SOUTH DAKOTA,		30					30
311	SLE	SALEM, OREGON, USA							30
312	SHR	SHERIDAN, WYOMING, US							30
314	VEL	VERNAL, UTAH, USA							30
316	BKX	BROOKINGS, SOUTH DAKO							20
317	CDC	CEDAR CITY, UTAH, USA							20
318	COE	COEUR D'ALENE, IDAHO,							20
320	FFM	FERGUS FALLS, MINNESO							20
321	GBD	GREAT BEND, KANSAS, U							20
322	HOT	HOT SPRINGS, ARKANSAS							20
324	JMS	JAMESTOWN, NORTH DAKO							20

NORTHWEST'S MINNEAPOLIS / ST. PAUL SERVICE AREA WILL CONVENIENCE MORE PASSENGERS AND WILL PROVIDE MORE MARKETS WITH LOW CIRCUITY SERVICE WEST OF THE MISSISSIPPI THAN ANY OTHER CARRIER

(Rebuttal To TWA's Toronto Application)

US Cities Without Toronto Nonstop Jet Service
Ranked By 1993 O&D Passengers

US Rank	Origin Code	Origin City	Applicant: Gateway:	Northwest MSP	TWA STL	USAir PIT	Delta ATL	Continental EWR	CY 1993
325	LMT	KLAMATH FALLS, OREGON							20
326	HII	LAKE HAVASU CITY, ARI							20
327	LAR	LARAMIE, WYOMING, USA							20
328	LBL	LIBERAL, KANSAS, USA							20
329	COD	LOVELL/CODY, WYOMING,							20
330	MHK	MANHATTAN, KANSAS, US							20
332	LBF	NORTH PLATTE, NEBRASK							20
334	PRC	PRESCOTT, ARIZONA, US							20
335	STS	SANTA ROSA, CALIFORNI							20
336	ALW	WALLA WALLA, WASHINGT							20
337	OTG	WORTHINGTON, MINNESOT							20
338	BRO	BROWNSVILLE, TEXAS, U							10
339	CEZ	CORTEZ, COLORADO, USA							10
341	IPL	EL CENTRO, CALIFORNIA							10
342	GRI	GRAND ISLAND, NEBRASK							10
343	HRO	HARRISON, ARKANSAS, U							10
345	JBR	JONESBORO, ARKANSAS,							10
346	MMH	MAMMOTH LAKES, CALIFO							10
348	CLM	PORT ANGELES, WASHING							10
349	ROW	ROSWELL, NEW MEXICO,							10
351	SOW	SHOW LOW, ARIZONA, US							10
354	VCT	VICTORIA, TEXAS, USA							10
355	WYS	WEST YELLOWSTONE, MON							10
356	YKM	YAKIMA, WASHINGTON, U							10
364	BHC	BULLHEAD CITY, ARIZON							0
365	CGI	CAPE GIRARDEAU, MISSO							0
367	CNM	CARLSBAD, NEW MEXICO,							0
368	CDR	CHADRON, NEBRASKA, US							0
369	CCR	CONCORD, CALIFORNIA,							0
371	DVL	DEVILS LAKE, NORTH DA							0
373	ELD	EL DORADO, ARKANSAS,							0
377	FRM	FAIRMONT, MINNESOTA,							0
380	GCK	GARDEN CITY, KANSAS,							0
381	GLD	GOODLAND, KANSAS, USA							0
382	HYS	HAYS, KANSAS, USA							0
384	HON	HURON, SOUTH DAKOTA,							0
386	EAR	KEARNEY, NEBRASKA, US							0
389	COD	LOVELL/CODY, WYOMING,							0
391	MKT	MANKATO, MINNESOTA, U							0
394	MCE	MERCED, CALIFORNIA, U							0
395	MHE	MITCHELL, SOUTH DAKOT							0
398	OFK	NORFOLK, NEBRASKA, US							0
399	OTH	NORTH BEND, OREGON, U							0
401	PGA	PAGE, ARIZONA, USA							0
402	PDT	PENDLETON, OREGON, US							0
403	PNC	PONCA CITY, OKLAHOMA,							0
406	RIW	RIVERTON, WYOMING, US							0
409	SLN	SALINA, KANSAS, USA							0
410	SNA	SANTA ANA, CALIFORNIA							0
411	SAF	SANTA FE, NEW MEXICO,							0
413	BFF	SCOTTSBLUFF, NEBRASKA							0
414	SCK	STOCKTON, CALIFORNIA,							0

NORTHWEST'S MINNEAPOLIS / ST. PAUL SERVICE AREA WILL CONVENIENCE MORE PASSENGERS AND WILL PROVIDE MORE MARKETS WITH LOW CIRCUITY SERVICE WEST OF THE MISSISSIPPI THAN ANY OTHER CARRIER

(Rebuttal To TWA's Toronto Application)

US Cities Without Toronto Nonstop Jet Service
Ranked By 1993 O&D Passengers

US Rank	Origin Code	Origin City	Applicant: / Gateway:	Northwest MSP	TWA STL	USAir PIT	Delta ATL	Continental EWR	CY 1993
415	TSM	TAOS, NEW MEXICO, USA							0
418	WHR	VAIL, COLORADO, USA							0
421	INW	WINSLOW, ARIZONA, USA							0
									140
	Total			**327,840**	**218,480**	**31,540**	**27,560**	**0**	**548,970**
	Number of Cities Served			27	18	6	1	0	211

Source: Carriers' Applications, Exhibit NW-109

NORTHWEST'S MINNEAPOLIS / ST. PAUL SERVICE AREA INCLUDES MORE PEOPLE WEST OF THE MISSISSIPPI THAN ANY OTHER CARRIER

(Rebuttal to Carriers' Toronto Service Proposals)

Market (Population in 000's)	Applicant: Gateway:	Northwest Minneapolis	TWA St. Louis	USAir Pittsburgh	Delta Atlanta	Continental Newark
Arizona		2,955 *	4,011			
Arkansas			1,604 •			
California		31,727	20,247 *			
Colorado		3,384 *	376 •			
Idaho		1,116				
Iowa						
Kansas			1,988 •			
Louisiana			468 •	3,000	1,280 *	
Minnesota		3,252 *				
Missouri			2,638 •			
Montana		836				
Nebraska		93 *				
Nevada		1,415	912 •			
New Mexico		198 *	1,625			
North Dakota		470 •				
Oklahoma			3,240			
Oregon		3,062				
South Dakota		642				
Tennessee						
Texas			18,153	4,689 *		
Utah		1,873	98 *			
Washington		5,282				
Wyoming		467				
Total		**56,772**	**55,358**	**7,689**	**1,280**	**0**
% of Total US Population		**21.9%**	**21.3%**	**3.0%**	**0.5%**	**0.0%**

Total US Population 259,574

* indicates partial state population

Source: Sales & Marketing Management -- 1994 Survey of Buying Power

THE MINNEAPOLIS / ST. PAUL HUB SERVES A DIFFERENT CATCHMENT AREA THAN AMERICAN OR UNITED SERVICE VIA CHICAGO OR NORTHWEST VIA ITS DETROIT HUB

35 Of Northwest's Proposed 60 Toronto Markets Via Minneapolis / St. Paul Have No Published American or United Service via Chicago

(Rebuttal to Carrier's Toronto Service Proposals)

Northwest's Forecast Single Plane And Online Connecting Toronto Markets: 1/	**60**
Less: Overlap Markets With Existing Published American or United Single Plane And/Or Connecting Toronto Services Via Chicago: 2/	Albuquerque, NM Boise, ID Chicago, IL Dallas / Ft. Worth, TX Denver, CO Des Moines, IA Honolulu, HI Kansas City, MO Las Vegas, NV Los Angeles, CA Minneapolis / St. Paul, MN Omaha, NE Ontario, CA Orange County, CA Phoenix, AZ Portland, OR Sacramento, CA Salt Lake City, UT San Diego, CA San Francisco, CA San Jose, CA Seattle, WA Spokane, WA St. Louis, MO Tucson, AZ
Total Overlap Markets	**25**
Nonduplicative Markets	**35**
Percent Nonduplicative Markets Of Total Forecast Markets	**58.3%**

1/ From Exhibit NW-301
2/ Existing published services from the March 1995 Official Airline Guide.

THE MINNEAPOLIS/ST. PAUL HUB SERVES DIFFERENT CATCHMENT AREA THAN AMERICAN OR UNITED SEVICE VIA CHICAGO OR NORTHWEST VIA ITS DETROIT HUB

51 Of Northwest's Proposed 60 Toronto Markets
Via Minneapolis/St. Paul Have No Published
Northwest Service Via Detroit

(Rebuttal to Carriers' Toronto Service Proposals)

Northwest's Forecast Single Plane And Online Connecting Toronto Markets: 1/	**60**
Less: Overlap Markets With Existing Published Northwest Single Plane And/Or Connecting Toronto Services Via Detroit: 2/	Anchorage Detroit Grand Rapids Las Vegas Los Angeles Phoenix San Diego San Francisco Seattle
Total Overlap Markets	9
Nonduplicative Markets	**51**
Percent Nonduplicative Markets Of Total Forecast Markets	**85.0%**

1/ From Exhibit NW-301.
2/ Existing published services from the March 1995 Official Airline Guide.

NORTHWEST'S DETROIT - TORONTO SERVICE IS AT MAXIMUM CAPACITY TORONTO - MINNEAPOLIS / ST. PAUL SERVICE IS NEEDED TO ACCOMMODATE PASSENGER TRAFFIC TO THE WEST

(Rebuttal to Carriers' Toronto Service Proposals)

Northwest operates B-757 Flights into all 5 of its Connecting Banks at Detroit

Flight Number	Departs Toronto	Arrives Detroit	Type of Aircraft
331	7:00 AM	8:31 AM	B - 757
249	9:55 AM	11:01 AM	B - 757
415	1:10 PM	2:18 PM	B - 757
251	4:30 PM	5:35 PM	B - 757
419	7:55 PM	9:07 PM	B - 757

Flight Number	Departs Detroit	Arrives Toronto	Type of Aircraft
414	7:25 AM	8:33 AM	B - 757
412	10:45 AM	11:49 AM	B - 757
746	1:50 PM	2:58 PM	B - 757
100	5:05 PM	6:18 PM	B - 757
342	8:45 PM	9:57 PM	B - 757

Source: Official Airline Guide - March 1995

Docket 50168
Exhibit NW-R-10
Page 1 of 1

AMONG TOP CITIES WEST OF THE MISSISSIPPI RIVER WITHOUT TORONTO NONSTOP SERVICE, MINNEAPOLIS/ST. PAUL HAS THE MOST TORONTO O&D PASSENGER TRAFFIC

Minneapolis/St. Paul is Also a Larger City than Eighth Ranked St. Louis

(Rebuttal to Exhibit TW-151)

Rank	U.S. Cities West Of Mississippi River Without Toronto Nonstop Service	Metropolitan Population At 1-1-94	1993 O&D Passengers
1	***Minneapolis/St. Paul***	***2,695,300***	***51,290***
2	Phoenix	2,447,700	49,030
3	Denver	2,172,400	39,820
4	San Diego	2,656,700	32,030
5	Las Vegas	1,040,000	31,900
6	Seattle	3,220,900	29,360
7	Houston	4,037,900	29,070
8	***St. Louis***	***2,555,300***	***28,520***
9	New Orleans	1,316,400	27,560
10	Kansas City	1,657,700	19,990

Source: Exhibit PC-IR-2D
Sales & Marketing Management, August 1994

BASED ON APPLES AND APPLES, THE TORONTO-MINNEAPOLIS/ST. PAUL MARKET IS SIGNIFICANTLY LARGER THAN THE TORONTO-ST. LOUIS MARKET

Summary

(Rebuttal to Exhibit TW-301)

	Local Toronto YE 3/96 O&D Passengers		
	Minneapolis/ St. Paul	St. Louis	Percent MSP Larger Than STL
Based On Northwest's Conservative Forecasting Methodology 1/	60,319	39,116	**54.2%**
Based On TWA's Aggressive Forecasting Methodology 2/	112,966	61,640	**83.3%**

1/ From page 2 of this exhibit.

2/ From page 4 of this exhibit.

BASED ON APPLES AND APPLES, THE TORONTO-MINNEAPOLIS/ST. PAUL MARKET IS SIGNIFICANTLY LARGER THAN THE TORONTO-ST. LOUIS MARKET

Based On Northwest's Conservative Forecasting Methodology,
TWA Has Overstated The
Toronto-St. Louis Local Market By Nearly 60%

(Rebuttal to Exhibit TW-301)

	Toronto-St. Louis	
Year Ended June 30, 1994		
O&D Passengers	28,570	1/
Market Growth (@3% annual growth)	1.05317	2/
Year Ending March 31, 1996		
O&D Passengers After Growth	30,089	
Service Stimulation	1.30	3/
Adjusted O&D Passengers After Service Stimulation	**39,116**	

TW YYZ-STL O&D Passenger Overstatement	**57.6%**	4/

1/ From TWA Exhibit TW-301.
2/ From Northwest Exhibit NW-301.
3/ From page 3 of this exhibit.
4/ TWA forecast 61,640 O&D passengers in the Toronto-St. Louis local market (TWA Exhibit TW-301).

BASED ON APPLES AND APPLES, THE TORONTO-MINNEAPOLIS/ST. PAUL MARKET IS SIGNIFICANTLY LARGER THAN THE TORONTO-ST. LOUIS MARKET

Estimated Service Stimulation

Year Ending March 31, 1996

Published One-Way Service In Both Directions								
				Weekly			Increase	Indicated
Between Toronto And	Carrier	Equip.	Stops	Flights	QSI 1/	Market Share	From Base Year	Service Stimulation
St. Louis								
Base Year	AA	Jet	1	14	7.70			
	DL/DL*	Jet/CRJ	1	26	2.86			
	AA/AA	757/Jet	1	7	1.93			
	NW/NW	Jet/757	1	7	1.93			
	UA/UA	Jet/757	1	7	1.93			
	UA/UA	Jet/Jet	1	7	1.93			
	US/DL	Jet/Jet	1	14	1.93			
	AC/TW	Jet/Jet	1	7	0.96			
	AA/AA	757/100	1	7	0.77			
	AA/AA	Jet/100	1	7	0.77			
	TW/AC*	Jet/DH8	1	1	0.03			
	Subtotal				22.74	44.8%		
Forecast Year	TW	M80	0	28	28.00	55.2%		
	Total				50.74	100.0%	123.1%	28.5%

1/ QSI values for online and interline connecting services weighted at one-half and one-fourth, respectively.

Source: Official Airline Guide, Summer (August) 1994

BASED ON APPLES AND APPLES, THE TORONTO-MINNEAPOLIS/ST. PAUL MARKET IS SIGNIFICANTLY LARGER THAN THE TORONTO-ST. LOUIS MARKET

Based On TWA's Aggressive Forecasting Methodology
Northwest Has Understated The
Toronto-Minneapolis/St. Paul Local Market By Nearly 50%

(Rebuttal to Exhibit TW-301)

	Toronto-Minneapolis/St. Paul	
Calendar Year 1993		
O&D Passengers	51,290	1/
Market Growth (@ 4.5% annual growth)	1.10125	2/
Year Ending March 31, 1996		
O&D Passengers After Growth	56,483	
Service Stimulation (@ 100% for first nonstop service)	2.00	2/
Adjusted O&D Passengers After Service Stimulation	**112,966**	

NW YYZ-MSP O&D Passenger Understatement	**46.6%**	3/

1/ From Northwest Exhibit NW-301.
2/ From TWA Exhibit TW-301.
3/ Northwest forecast 60,319 O&D passengers in the Totonto-Minneapolis/St. Paul local market (Northwest Exhibit NW-301).

THE PROPOSED MARKET SHARE FOR NORTHWEST OF 30% IN THE TORONTO-MINNEAPOLIS/ST. PAUL MARKET IS EASILY ATTAINABLE AND REASONABLE, WHILE TWA'S PROPOSED MARKET SHARE OF 75% IN THE TORONTO-ST. LOUIS MARKET IS NOT

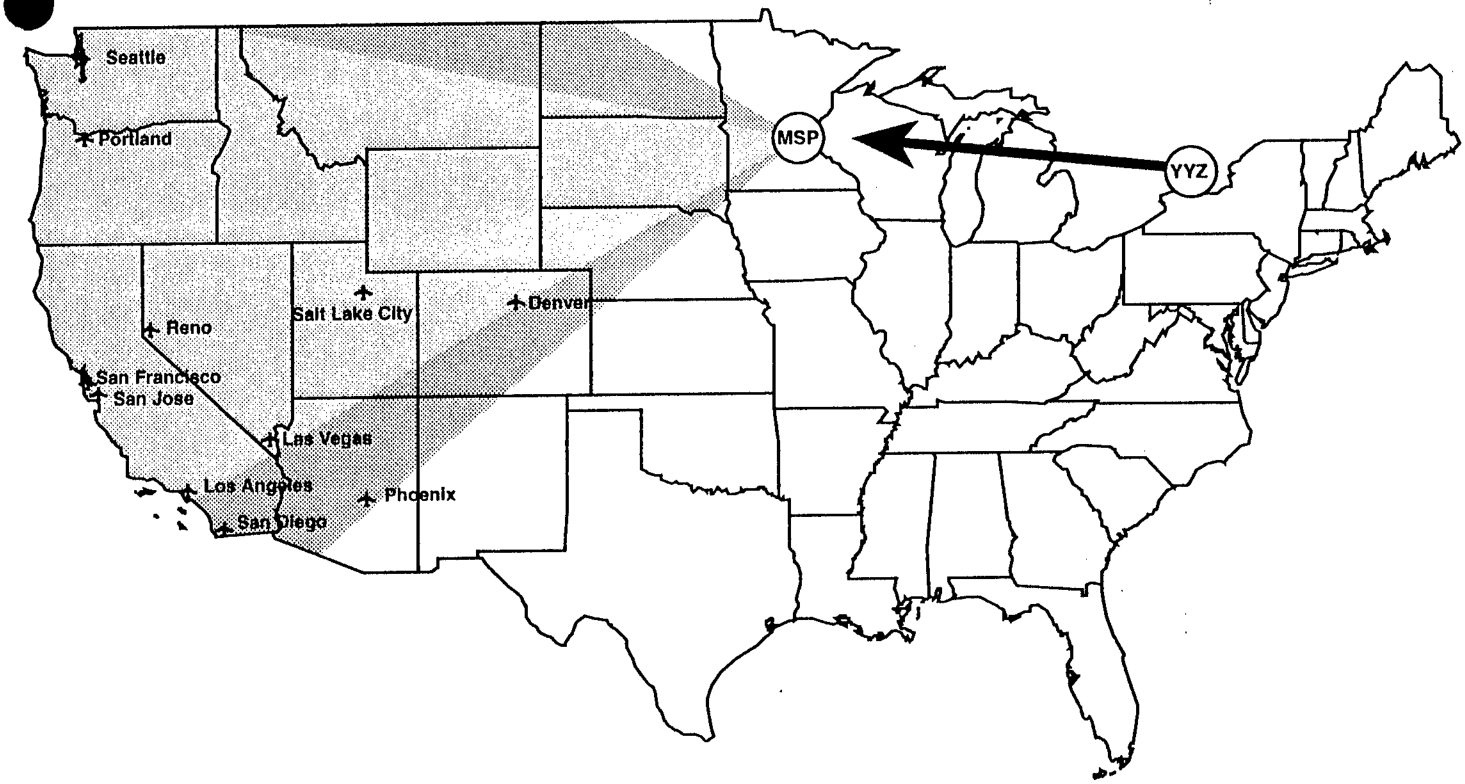
(Rebuttal to Exhibit TW-301)

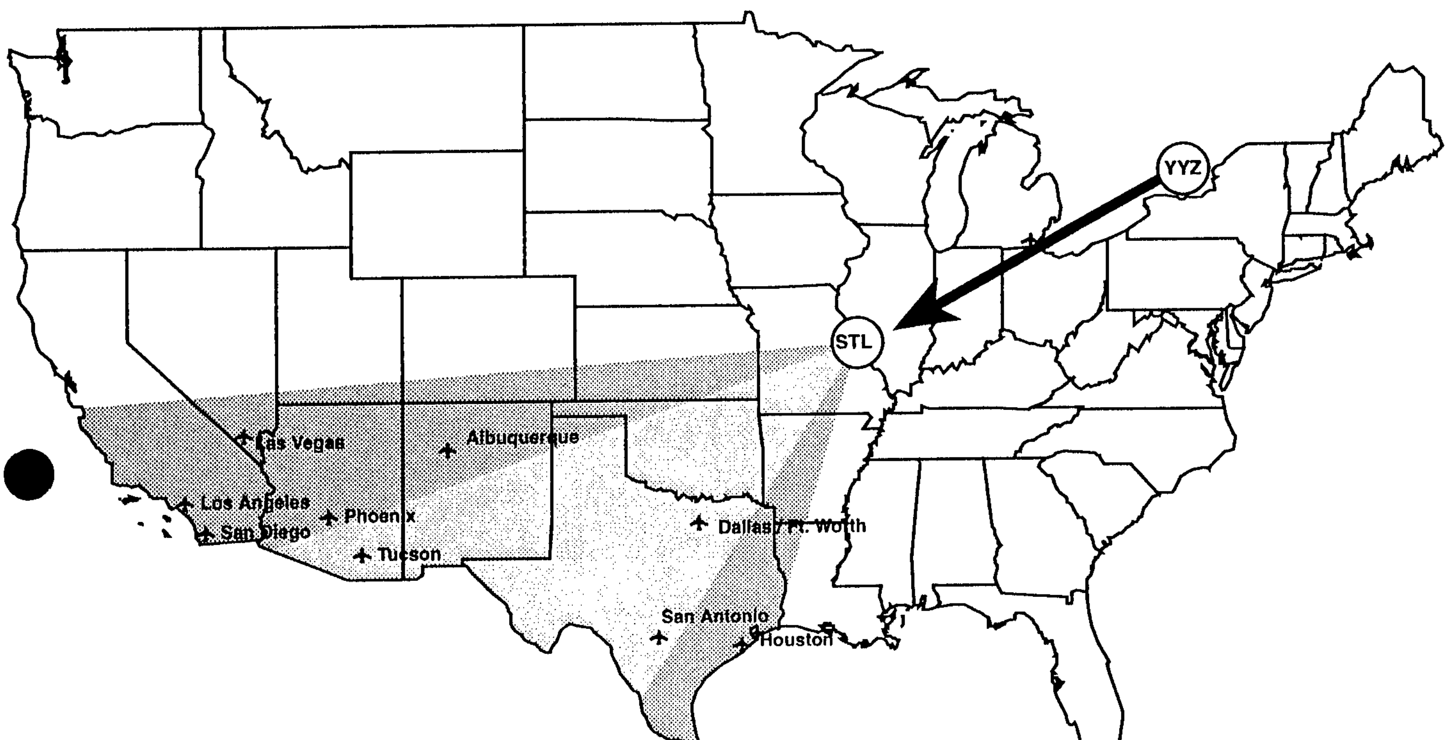
	Weekly QSI	Indicated Market Share
Northwest, with five nonstop roundtrips in the Toronto-Detroit market, has 99.5% of the total unduplicated published service QSI containing virtually no connecting services and carries approximately the same share of traffic.		
Northwest	**91.00**	**99.5%**
All other services 1/	0.47	0.5%
Total	91.47	100.0%
Northwest, with only two proposed nonstop round-trips in the Toronto-Minneapolis/St. Paul market, has 33.3% of the total unduplicated published service QSI containing multiple services via Chicago and Detroit.		
Proposed Northwest	**28.00**	**33.3%**
All other Services (Exhibit NW-304) 1/	56.10	66.7%
Total	84.10	100.0%
TWA, with only two proposed nonstop roundtrips in the Toronto-St. Louis market, has 55.2% of the total unduplicated published service QSI containing multiple services via Chicago and Cincinnati.		
Proposed TWA	**28.00**	**55.2%**
All other services (Exhibit NW-R-10, page 3) 1/	22.74	44.8%
	50.74	100.0%

1/ Services with O&D Survey passengers likely to be reported by a U.S. or Canadian carrier.

NORTHWEST VIA MINNEAPOLIS / ST. PAUL HAS A BROADER MARKET COVERAGE THAN TWA VIA ST. LOUIS

(Rebuttal to TWA's Service Proposal)





Source: Great Circle Mileages

AMONG TOP CITIES WITHOUT TORONTO NONSTOP SERVICE, PITTSBURGH RANKS BEHIND FIVE MARKETS, INCLUDING NUMBER TWO RANKED MINNEAPOLIS / ST. PAUL

Pittsburgh, a Smaller City than Minneapolis / St. Paul, Already Has Nonstop Service

(Rebuttal to Exhibit US-201)

Rank	U.S. Cities Without Toronto Nonstop Service	Metropolitan Population At 1-1-94	1993 O&D Passengers
1	Orlando	1,354,300	74,340
2	***Minneapolis/St. Paul***	***2,695,300***	***51,290***
3	Phoenix	2,447,700	49,030
4	Fort Lauderdale	1,335,000	40,740
5	Denver	2,172,400	39,820
	Pittsburgh	***2,388,000***	***32,180***
6	San Diego	2,656,700	32,030
7	Las Vegas	1,040,000	31,900
8	Seattle	3,220,900	29,360
9	St. Louis	2,555,300	28,520
10	New Orleans	1,316,400	27,560

Source: Exhibit PC-IR-2D
Sales & Marketing Management, August 1994

DELTA ALREADY ADEQUATELY SERVES PITTSBURGH

April 1995

(Rebuttal To USAir's Service Proposal)

	Toronto - Pittsburgh		
	Flight Number	Equipment	Daily Nonstop Seats
Northbound:	DL 312	757	180
	DL 662	72S	144
	DL1132	757	180
	DL 2028	757	180
Southbound:	DL 555	757	180
	DL 1083	72S	144
	DL 1151	757	180
	DL 2029	757	180
Total Both Directions			**1,368**

Source: Official Airline Guide, April 1995

USAIR CAN ALREADY OFFER ONLINE SERVICE TO 85% OF ALL ITS PROPOSED CITIES BEYOND PITTSBURGH

March 1995

(Rebuttal To Exhibits US-102 and 204)

USAir			USAir Single Plane Service Between Other USAir Toronto Gateways And Proposed Beyond Pittsburgh Markets						
Proposed Toronto Beyond Pittsburgh Markets		Single Plane Service To PIT	BWI	BOS	CLE	DAY	IND	PHL	ROC
Akron/Canton	CAK	NS			NS*		1-S*		
Albany, NY	ALB	NS	NS	NS*	1-S			NS	NS*
Albuquerque	ABQ	NS						1-S	
Allentown	ABE	NS	NS*				1-S	NS*	
Altoona	AOO	NS*							
Ashland/Huntington	HTS	NS							
Atlanta	ATL	NS	NS	1-S	1-S	1-S	1-S	NS	1-S
Austin	AUS	NS						2-S	
# Baltimore	BWI	NS		NS	NS		NS	NS*	NS
Binghamton	BGM	NS	NS*	NS*				NS*	
Birmingham	BHM	NS	NS						
# Boston	BOS	NS	NS			1-S	NS	NS	NS
Burlington, VT	BTV	NS	1-S*	NS*		1-S	1-S	NS	1-S*
Charleston, WV	CRW	NS					1-S	1-S*	
Charlotte	CLT	NS	NS	NS	NS	NS	NS	NS	NS
Charlottesville	CHO	NS*	NS*						
Chicago	ORD	NS	NS					NS	
Cincinnati	CVG	NS						NS	
Clarksburg	CKB	NS*							
# Cleveland	CLE	NS	NS				NS*	NS	
Columbus, OH	CMH	NS	NS	NS		NS	NS*	NS	1-S
Cumberland	CBE	NS*							
Dallas/Ft. Worth	DFW	NS		1-S	1-S			NS	1-S
# Dayton	DAY	NS		1-S			NS*	NS	1-S
Denver	DEN	NS	1-S					NS	
Detroit	DTW	NS				NS*	NS*	NS	
Elmira	ELM	NS		1-S*		1-S		NS*	
Evansville	EVV	NS			1-S		NS*		
Flint	FNT	NS		1-S					
Fort Myers	RSW	NS	NS	NS	1-S	1-S	NS	NS	
Fort Wayne	FWA	NS			1-S*		NS*		
Ft. Lauderdale	FLL	NS	NS	NS	1-S	1-S	1-S	NS	1-S
Grand Rapids	GRR	NS				NS*	NS*	1-S	
Greenbrier	LWB	NS*							
Greensboro/High Point	GSO	NS	NS	1-S	1-S			NS	1-S
Hagerstown	HGR	NS	NS*						
Harrisburg	MDT	NS	NS*	NS*				NS*	1-S*
Hartford/Springfield	BDL	NS	NS	NS*			1-S	NS	1-S
Houston	IAH	NS	1-S	1-S				1-S	1-S

USAIR CAN ALREADY OFFER ONLINE SERVICE TO 85% OF ALL ITS PROPOSED CITIES BEYOND PITTSBURGH

March 1995

(Rebuttal To Exhibits US-102 and 204)

USAir			USAir Single Plane Service Between Other USAir Toronto Gateways And Proposed Beyond Pittsburgh Markets						
Proposed Toronto Beyond Pittsburgh Markets		Single Plane Service To PIT	BWI	BOS	CLE	DAY	IND	PHL	ROC
# Indianapolis	IND	NS	NS	NS	NS*	NS*		NS	1-S
Jacksonville, FL	JAX	NS	NS	1-S	1-S			NS	1-S
Johnstown	JST	NS*							
Kalamazoo	AZO	NS							
Kansas City	MCI	NS	NS	NS	1-S*	1-S*	NS*	NS	
Knoxville	TYS	NS			1-S				
Lancaster	LNS	NS*						NS*	
Lansing	LAN	NS							
Las Vegas	LAS	NS	NS	1-S			NS	NS	
Lexington/Frankfurt	LEX	NS			1-S				
Long Island/Islip	ISP	NS	NS*	NS*		1-S		NS*	1-S*
Los Angeles	LAX	NS	NS	1-S		NS	NS	NS	
Louisville	SDF	NS	NS	1-S				1-S	
Lynchburg	LYH	NS*							
Manchester	MHT	NS	1-S*	NS*		1-S		NS	
Memphis	MEM	NS		1-S					
Miami	MIA	NS	NS	1-S	1-S	1-S	NS	NS	1-S
Milwaukee	MKE	NS	1-S		1-S		NS*		
Minneapolis/St. Paul	MSP	NS							
Morgantown	MGW	NS							
Nashville	BNA	NS		1-S			NS*		1-S
New Orleans	MSY	NS	NS	1-S			1-S	NS	1-S
New York/Newark	NYC	NS	NS	NS		NS	NS	NS	NS
Newburgh	SWF	NS						NS*	
Newport News/Hampton	PHF	NS	NS*					NS*	
Norfolk	ORF	NS	NS	NS	1-S*			NS	
Oil City/Franklin	FKL	NS*							
Orange Co., CA	SNA	NS							
Orlando	MCO	NS	NS	NS	NS	NS	NS	NS	NS
Parkersburg	PKB	NS*							
# Philadelphia	PHL	NS	NS*	NS	NS	NS	NS		NS
Phoenix	PHX	NS	1-S	1-S			NS	NS	2-S
Pittsburgh	PIT		NS	NS	NS	NS	NS	NS	NS
Portland, ME	PWM	NS		NS*			1-S	NS	
Providence	PVD	NS	NS	NS*		1-S	1-S	NS	2-S*
Raleigh/Durham	RDU	NS	NS	1-S	1-S			NS	
Reading	RDG	NS*	NS*	1-S*				US*	
Richmond, VA	RIC	NS	NS	NS				US	1-S
Roanoke	ROA	NS	NS				1-S		

USAIR CAN ALREADY OFFER ONLINE SERVICE TO 85% OF ALL ITS PROPOSED CITIES BEYOND PITTSBURGH

March 1995

(Rebuttal To Exhibits US-102 and 204)

USAir Proposed Toronto Beyond Pittsburgh Markets		USAir Single Plane Service To PIT	USAir Single Plane Service Between Other USAir Toronto Gateways And Proposed Beyond Pittsburgh Markets						
			BWI	BOS	CLE	DAY	IND	PHL	ROC
Saginaw	MBS	NS*							
San Antonio	SAT	NS	2-S	2-S				1-S	
San Diego	SAN	NS						1-S	
San Francisco	SFO	NS	NS	1-S		2-S	1-S	NS	
San Juan	SJU	1-S	NS					NS	
Sarasota/Bradenton	SRQ	NS						NS	
Seattle	SEA	NS		1-S				1-S	
South Bend	SBN	NS			1-S*		NS*	1-S	
State College	SCE	NS*						NS*	
St. Louis	STL	NS						1-S	
Tampa	TPA	NS	NS	NS	NS	1-S	NS	NS	1-S
Toledo	TOL	NS	1-S				NS*		
Washington, DC	DCA	NS	NS*	NS		NS	NS	NS*	NS
Westchester Co., NY	HPN	NS	NS*	NS*		1-S		NS*	NS*
West Palm Beach	PBI	NS	NS	NS	1-S			NS	2-S
Wilkes-Barre/Scranton	AVP	NS	NS*	NS*				NS	
Williamsport	IPT	NS*						NS*	
Youngstown	YNG	NS*							
Total Markets		95	52	48	26	25	38	65	31

Total Markets Via Pittsburgh	95
Unduplicated Markets Served Via Other USAir Gateways	81
Percent Markets Served Via Other USAir Gateways	**85.2%**

* USAIr Express.

Other existing USAir Toronto gateways.

Source: Exhibits US-204, 205 and 301-Revised
Official Airline Guide, March 1995

EXCLUDING MINNEAPOLIS / ST. PAUL AND PITTSBURGH, USAIR WOULD PROVIDE NEW USAIR ONLINE SERVICE TO ONLY 0.6% OF THE O&D TRAFFIC IN USAIR'S PROPOSED MARKETS

(Rebuttal to USAir's Service Proposal)

Proposed Toronto - Pittsburgh and Beyond Pittsburgh Markets Not Served via Other USAir Toronto Gateways	Annual Passengers Year Ended June 1994	
Altoona	120	
Ashland / Huntington	310	
Clarksburgh	320	
Cumberland	150	
Greenbrier	60	
Johnstown	50	
Kalamazoo	3,920	
Lansing	1,570	
Minneapolis / St. Paul	**53,220**	*
Morgantown	130	
Oil City / Franklin	30	
Orange Co., CA	13,300	
Parkersburg	230	
Pittsburgh	**31,120**	**
Saginaw	2,090	
Total of Above	**106,620**	
Total Passengers in USAir's Proposed Toronto Markets for Year Ended June 1994	**3,512,130**	
Percent of Total Traffic in Proposed USAir Toronto Markets Provided New USAir Online Service	**3.0%**	
Percent Excluding Minneapolis / St. Paul and Pittsburgh	**0.6%**	

Source: Exhibits NW-R15, US-301 Revised

* Under Northwest's proposal, Minneapolis / St. Paul would receive Nonstop service. Thus, it is difficult to credit USAir's first on-line (to USAir) service as a meaningful public benefit.

** Pittsburgh already receives nonstop service from Delta

98% OF USAIR'S MARKET TRAFFIC IS ALREADY CONVENIENTLY SERVED AND OVER
70% OF USAIR'S PROPOSED MARKETS BEYOND PITTSBURGH ALREADY HAVE ONLINE SERVICE

(Rebuttal to USAir Exhibit US-301-Revised)

		USAir Cities	Non Stop Service	One Stop or Online Connecting	1993 O&D Passengers Nonstop	1993 O&D Passengers One Stop/ Connecting	1993 O&D
1	CAK	Akron/Canton			-	-	480
2	ALB	Albany, NY	YES		1,780	-	1,780
3	ABQ	Albuquerque		YES	-	9,280	9,280
4	ABE	Allentown		YES	-	4,200	4,200
5	AOO	Altoona			-	-	150
6	HTS	Ashland/Huntington			-	-	380
7	ATL	Atlanta		YES	-	90,110	90,110
8	AUS	Austin		YES	-	9,410	9,410
9	BWI	Baltimore	YES		19,450	-	19,450
10	BGM	Binghamton			-	-	290
11	BHM	Birmingham		YES	-	4,700	4,700
12	BOS	Boston	YES		207,990	-	207,990
13	BTV	Burlington, VT		YES	-	1,100	1,100
14	CRW	Charleston, WV		YES	-	840	840
15	CLT	Charlotte		YES	-	18,680	18,680
16	CHO	Charlottesville			-	-	930
17	ORD	Chicago	YES		9,850	-	9,850
18	CVG	Cincinnati	YES		7,590	-	7,590
19	CKB	Clarksburg			-	-	240
20	CLE	Cleveland	YES		50,990	-	50,990
21	CMH	Columbus, OH		YES	-	12,700	12,700
22	CBE	Cumberland			-	-	130
23	DFW	Dallas/Ft. Worth	YES		102,130	-	102,130
24	DAY	Dayton	YES		3,860	-	3,860
25	DEN	Denver		YES	-	39,820	39,820
26	DTW	Detroit	YES		76,510	-	76,510
27	ELM	Elmira			-	-	-
28	EVV	Evansville			-	-	2,070
29	FNT	Flint			-	-	530
30	RSW	Fort Myers		YES	-	17,660	17,660
31	FWA	Fort Wayne		YES	-	3,430	3,430
32	FLL	Ft. Lauderdale		YES	-	40,740	40,740
33	GRR	Grand Rapids	YES		10,870	-	10,870
34	LWB	Greenbrier			-	-	70
35	GSO	Greensboro/High Point		YES	-	8,520	8,520
36	HGR	Hagerstown			-	-	290
37	MDT	Harrisburg		YES	-	5,370	5,370
38	BDL	Hartford/Springfield	YES		21,000	-	21,000
39	IAH	Houston	YES		29,070	-	29,070
40	IND	Indianapolis	YES		16,710	-	16,710
41	JAX	Jacksonville, FL		YES	-	9,050	9,050
42	JST	Johnstown			-	-	30
43	AZO	Kalamazoo			-	-	3,590
44	MCI	Kansas City		YES	-	19,990	19,990
45	TYS	Knoxville		YES	-	4,150	4,150
46	LNS	Lancaster			-	-	670
47	LAN	Lansing		YES	-	1,380	1,380
48	LAS	Las Vegas		YES	-	31,900	31,900
49	LEX	Lexington/Frankfurt		YES	-	2,910	2,910
50	ISP	Long Island/Islip		YES	-	1,110	1,110
51	LAX	Los Angeles	YES		247,580	-	247,580
52	SDF	Louisville		YES	-	7,530	7,530
53	LYH	Lynchburg			-	-	670
54	MHT	Manchester		YES	-	1,550	1,550
55	MEM	Memphis		YES	-	10,370	10,370
56	MIA	Miami	YES		217,660	-	217,660

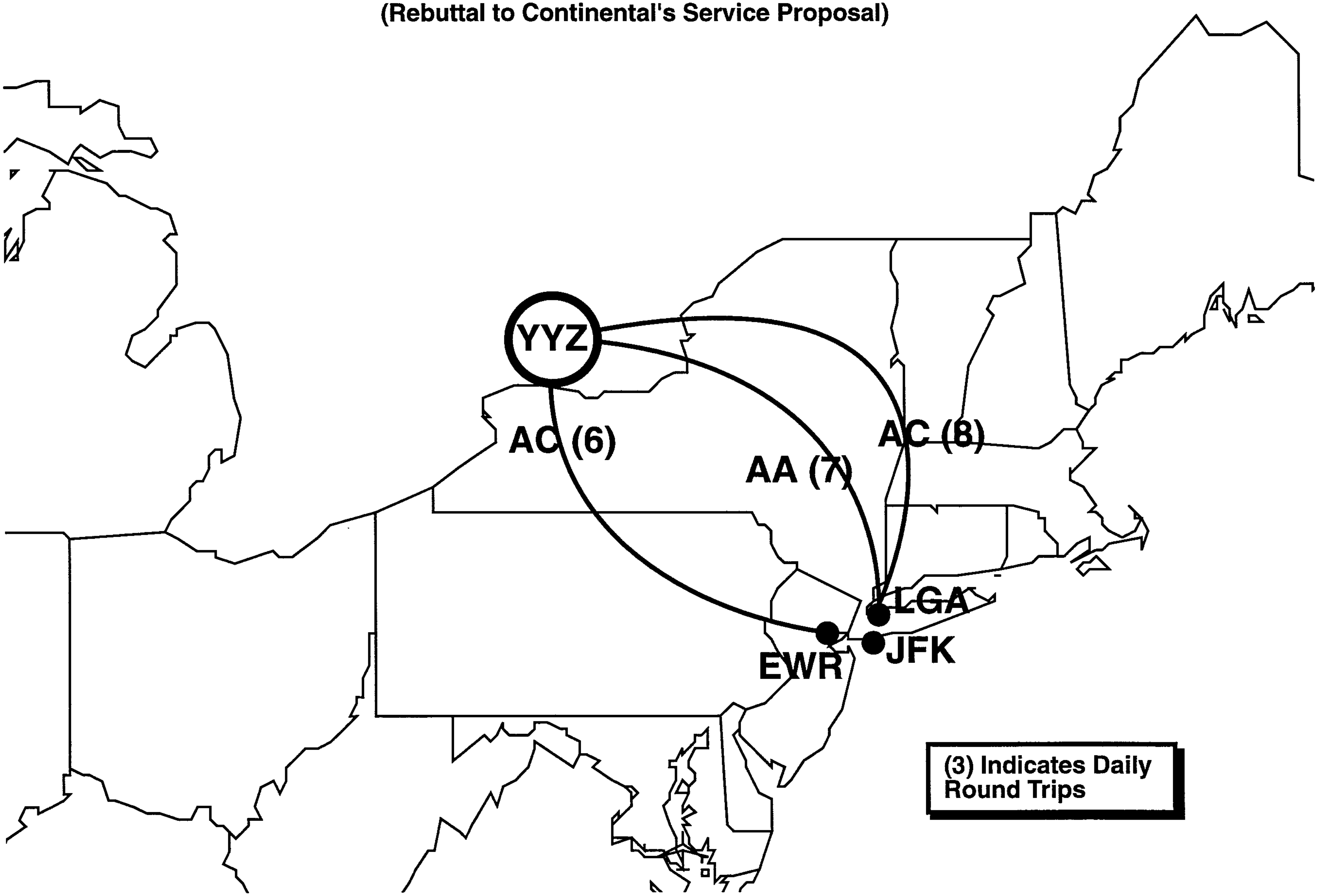
98% OF USAIR'S MARKET TRAFFIC IS ALREADY CONVENIENTLY SERVED AND OVER
70% OF USAIR'S PROPOSED MARKETS BEYOND PITTSBURGH ALREADY HAVE ONLINE SERVICE

(Rebuttal to USAir Exhibit US-301-Revised)

		USAir Cities	Non Stop Service	One Stop or Online Connecting	1993 O&D Passengers Nonstop	One Stop/ Connecting	1993 O&D
57	MKE	Milwaukee		YES	-	26,920	26,920
58	MSP	Minneapolis/St. Paul		YES	-	51,290	51,290
59	MGW	Morgantown			-	-	130
60	BNA	Nashville	YES		42,240	-	42,240
61	MSY	New Orleans		YES	-	27,560	27,560
62	NYC	New York/Newark	YES		6,900	-	6,900
63	SWF	Newburgh		YES	-	370	370
64	PHF	Newport News/Hampton		YES	-	870	870
65	ORF	Norfolk		YES	-	5,020	5,020
66	FKL	Oil City/Franklin			-	-	-
67	SNA	Orange Co., CA		YES	-	-	-
68	MCO	Orlando		YES	-	74,340	74,340
69	PKB	Parkersburg			-	-	240
70	PHL	Philadelphia	YES		107,190	-	107,190
71	PHX	Phoenix		YES	-	49,030	49,030
72	PIT	Pittsburgh	YES		32,180	-	32,180
73	PWM	Portland, ME		YES	-	3,880	3,880
74	PVD	Providence		YES	-	2,410	2,410
75	RDU	Raleigh/Durham		YES	-	28,070	28,070
76	RDG	Reading			-	-	720
77	RIC	Richmond, VA		YES	-	7,350	7,350
78	ROA	Roanoke		YES	-	1,650	1,650
79	MBS	Saginaw			-	-	1,970
80	SAT	San Antonio		YES	-	12,650	12,650
81	SAN	San Diego		YES	-	32,030	32,030
82	SFO	San Francisco	YES		171,040	-	171,040
83	SJU	San Juan			-	-	90
84	SRQ	Sarasota/Bradenton		YES	-	10,250	10,250
85	SEA	Seattle		YES	-	29,360	29,360
86	SBN	South Bend		YES	-	5,050	5,050
87	SBN	St. Louis		YES	-	5,050	5,050
88	STL	State College			-	-	28,520
89	TPA	Tampa	YES		206,400	-	206,400
90	TOL	Toledo			-	-	720
91	DCA	Washington, DC	YES		500	-	500
92	DCA	West Palm Beach		YES	-	500	500
93	PBI	Westchester Co., NY		YES	-	20,030	20,030
94	AVP	Wilkes-Barre/Scranton			-	-	1,550
95	IPT	Williamsport			-	-	480
96	YNG	Youngstown			-	-	140
		Totals	**22**	**47**	**1,589,490**	**750,180**	**2,384,750**
		Percentages	**23%**	**49%**	**67%**	**31%**	
		Total Percentages		**72%**		**98%**	

THE NEW YORK METROPOLITAN AREA IS ALREADY SERVED BY TWO TORONTO CARRIERS THROUGH TWO AIRPORTS

(Rebuttal to Continental's Service Proposal)



IF THE DEPARTMENT WERE TO GRANT CERTIFICATE AUTHORITY TO THE EXEMPTION CARRIERS, AMERICAN ALONG WITH DELTA AND USAIR WOULD HAVE ACCESS TO OVER THREE-FOURTHS OF THE U.S.-TORONTO PASSENGER TRAFFIC

(Rebuttal to Exhibits DL-101 and US-201)

Transborder U.S. Airline	Markets Served After Award	Toronto Inbound Weekly Scheduled Flights	Toronto Inbound Weekly Scheduled Seats	Percent Of Total Seats
American	**4**	**124**	**18,688**	**29.8%**
Delta	**9**	**194 1/**	**15,570 1/**	**24.8%**
USAir	**8**	**137**	**14,745**	**23.5%**
Subtotal		**455**	**49,003**	**78.1%**
United	2	42	7,322	11.7%
Northwest	1	35	6,440	10.2%
Total		532	62,765	100.0%

1/ Includes fourth Pittsburgh service effective January 1995.

Source: Existing flights and seats from Exhibit NW-303

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of April 1995, I served a copy of the Northwest Airlines' U.S.-Toronto Rebuttal Exhibits on the following individuals by hand, overnight delivery (*), or first class mail, postage prepaid (**).

Carl B. Nelson, Jr.
Associate General Counsel
AMERICAN AIRLINES, INC.
1101 17th St., N.W.
Suite 600
Washington, D.C. 20036

** Bill Alberger
Ball, Janik & Novack
1101 Pennsylvania Avenue, N.W.
Suite 1035
Washington, D.C. 20004
(FOR ATLANTA & GEORGIA PARTIES)

R. Bruce Keiner
Crowell & Moring
1001 Pennsylvania Avenue, N.W.
Suite 1100
Washington, D.C. 20004
(FOR CONTINENTAL)
- 2 copies

* Mark A. P. Drusch
Staff Vice President, International and Regulatory Affairs
CONTINENTAL AIRLINES, INC.
2929 Allen Parkway
Houston, TX 77019
(713) 834-6669
- 2 copies

Robert E. Cohn
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037
(FOR DELTA)
- 3 copies

** Jeffrey N. Shane
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, D.C. 20037-1420
(FOR MEMPHIS PARTIES)

** Jack Corbett
Rise Peters
Spiegel & McDiarmind
1350 New York Avenue, N.W.
Washington, D.C. 20005-4798
(FOR MINNEAPOLIS-ST. PAUL METROPOLITAN AIRPORTS COMMISSION)

Megan Rae Poldy
Associate General Counsel
NORTHWEST AIRLINES, INC.
901 15th Street, N.W.
Suite 310
Washington, D.C. 20005
- 2 copies

James Atwood
Covington & Burling
1201 Pennsylvania Avenue, N.W.
11th Floor Reception
Washington, D.C. 20044
(FOR NORTHWEST AIRLINES)
- 1 copy

* Phillip D. Roberts
Roberts, Roach & Associates
22320 Foothill Boulevard
Suite 510
Hayward, CA 94541
(FOR NORTHWEST AIRLINES)
- 1 copy

** Herbert C. Higginbotham
Director
Department of Aviation
PITTSBURGH INTERNATIONAL AIRPORT
Landside Terminal
Suite 4000
P.O. Box 12370
Pittsburgh, PA 15231-0370

Richard J. Fahy, Jr.
Consulting Attorney
808 17th Street, N.W.
Suite 520
Washington, D.C. 20006
(FOR TRANS WORLD AIRLINES)
- 3 copies

Frank Cotter, Esq.
Assistant General Counsel
USAIR, INC.
Crystal Park Four
2345 Crystal Drive
Arlington, VA 22227
- 2 copies

Richard Mathias
Zuckert, Scoutt & Rasenberger
888 17th Street, N.W.
Washington, D.C. 20006
(FOR USAIR, INC.)
- 2 copies

** EMBASSY OF CANADA
501 Pennsylvania Avenue, N.W.
Washington, D.C. 20001

** James R. Tarrant
Deputy Assistant Secretary for
Transportation Affairs
U.S. DEPARTMENT OF STATE
2201 C Street, N.W.
EB/TRA, Room 5830
Washington, D.C. 20520

Kimberly M. Kenner

Kimberly M. Kenner

<u>CERTIFICATE OF SERVICE</u>

I hereby certify that on this 19th day of April 1995, I served a copy of the foregoing document of Northwest Airlines on the following individuals by facsimile.

Bill Alberger
Ball, Janik & Novack
1101 Pennsylvania Avenue, N.W.
Suite 1035
Washington, D.C. 20004
(FOR ATLANTA & GEORGIA PARTIES)

R. Bruce Keiner
Crowell & Moring
1001 Pennsylvania Avenue, N.W.
Suite 1100
Washington, D.C. 20004
(FOR CONTINENTAL)

Mark A. P. Drusch
Staff Vice President, International and Regulatory Affairs
CONTINENTAL AIRLINES, INC.
2929 Allen Parkway
Houston, TX 77019

Robert E. Cohn
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037
(FOR DELTA)

Jeffrey N. Shane
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, D.C. 20037-1420
(FOR MEMPHIS PARTIES)

Jack Corbett
Rise Peters
Spiegel & McDiarmind
1350 New York Avenue, N.W.
Washington, D.C. 20005-4798
(FOR MINNEAPOLIS-ST. PAUL METROPOLITAN AIRPORTS COMMISSION)

Samuel Crane, President
Regional Business Partnership
METRO NEWARK CHAMBER OF COMMERCE
One Newark Center
NewarK, NJ 07102

Richard J. Fahy, Jr.
Consulting Attorney
808 17th Street, N.W.
Suite 520
Washington, D.C. 20006
(FOR TRANS WORLD AIRLINES)

Frank Cotter, Esq.
Assistant General Counsel
USAIR, INC.
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2345 Crystal Drive
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